

# Exhibit D

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SHABTAI SCOTT SHATSKY, et al., )  
 )  
Plaintiffs, )  
 )  
v. ) Civil Action No.  
 ) 1:02-CV-02280 (RJL)  
THE SYRIAN ARAB REPUBLIC, et al., )  
 )  
Defendants. )  
\_\_\_\_\_ )

VIDEOTAPED DEPOSITION OF

NADIME AL-BARAHME

JERUSALEM, ISRAEL

SEPTEMBER 11, 2012

REPORTED BY: AMY R. KATZ, RPR

SEPTEMBER 11, 2012 - NADIME AL-BARAHME

Videotaped deposition of NADIME AL-BARAHME,  
taken in the above-entitled cause pending in the  
United States District Court for the District of  
Columbia, pursuant to notice, before AMY R. KATZ, RPR,  
at the American Colony Hotel, Pasha Room, Jerusalem,  
Israel, on Tuesday, the 11th day of September, 2012,  
at 9:48 a.m.

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10 OSAMA SAADI, Advocate

11 JONATHAN ARNON, Advocate

## I N D E X

## WITNESS

Nadime Al-Barahme

## EXAMINATION

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By Mr. Schoen

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## LETTER

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## P R O C E E D I N G S

THE VIDEOGRAPHER: This is the videotaped deposition of Nadime Aref Barahme, taken by David Schoen, in the matter of Shatsky versus Syrian Arab Republic, held at the U.S. -- at the Colony Hotel, Jerusalem, Israel, September 11, 2012. The time is 9:48.

The court reporter is Amy Katz. The videographer is Mitchell Coopersmith.

Will the counsel now state their appearance.

MR. SCHOEN: Yes. David Schoen, for the plaintiffs. And it's been the practice to say everyone who is in the room. So on our side, it's Mordechai Haller, Avi Leitner, and Dina Rovner, all lawyers.

MR. O'TOOLE: Timothy O'Toole, for the defendants. And on the defendants' side with me is John Eustice; George Hazou, who is the check translator; Osama Saadi; and Jonathan Arnon.

THE VIDEOGRAPHER: Will the court reporter please --

MR. SCHOEN: Also present in the room are the two translators, who we've had all along, and the witness.

09:49:22 1 THE VIDEOGRAPHER: Will the court reporter  
09:49:23 2 swear the witness and the translators.

3  
4 ALBERT AGHAZARIAN

5 -and-

6 SHIMON BEN-NAIM,  
7 the Official Arabic Interpreters, were  
8 duly affirmed to translate from English  
9 to Arabic and from Arabic to English.

10  
11 NADIME AL-BARAHME,  
12 called as a witness, being first duly  
13 affirmed, was examined and testified  
14 as hereinafter set forth.

15  
16 (The following proceedings were conducted  
17 through the Official Arabic Interpreters,  
18 unless otherwise indicated.)  
19

09:49:54 20 MR. SCHOEN: All right. We will proceed now.

09:49:57 21 A couple of preliminary statements I wanted  
09:50:00 22 to make, the first of which I wouldn't ordinarily make.  
09:50:03 23 But since defense counsel decided to do this to me the  
09:50:07 24 first day, I will do it in return.

09:50:10 25 We're starting the deposition today at the

09:50:11 1 time we're starting because the witness arrived with  
09:50:16 2 Mr. Saadi, at approximately 9:45. I assume the witness  
09:50:21 3 was stuck in traffic. That was my reason the first  
09:50:24 4 day I was late. But I want to be clear that we're not  
09:50:28 5 delaying the start of this deposition. That's number  
09:50:30 6 one.

09:50:33 7 Number two is that I want to be clear for  
09:50:37 8 the record, as I said in the e-mail exchanges last  
09:50:41 9 night with Mr. McAleer, we will take -- we'll take  
09:50:48 10 this deposition today subject to the objections raised  
09:50:54 11 in the e-mail, which I don't think it's necessary to  
09:51:00 12 go into further detail now. The e-mails last night  
09:51:07 13 and this morning speak for themselves, as far as I'm  
09:51:11 14 concerned.

09:51:15 15 And I want to reiterate, as indicated in the  
09:51:18 16 e-mails, again, just by way of notice -- and I don't  
09:51:21 17 think it's necessary -- we intend to file a motion for  
09:51:26 18 sanctions based on the matter discussed in the e-mails.

09:51:31 19  
09:51:31 20 EXAMINATION

09:51:49 21 BY MR. SCHOEN:

09:51:31 22 Q. Sir, may I have your full name, please?

09:51:52 23 MR. O'TOOLE: Before we get started, if I  
09:51:54 24 could just briefly respond to a few of those points.

09:51:57 25 First of all, with respect to delay, I would



09:51:58 1 just note that, again, I agree that it's normally not  
09:52:00 2 appropriate to put it on the record. But since you did,  
09:52:03 3 I would just add that you yourself were stuck in traffic  
09:52:06 4 today and not here at the 9:00 o'clock hour.

09:52:08 5 MR. SCHOEN: Correct.

09:52:08 6 MR. O'TOOLE: So I want to make the record  
09:52:10 7 very clear that there was no suggestion of any sort  
09:52:13 8 of intentional delay of this deposition. And, of  
09:52:16 9 course, it's starting now, and you will have the time  
09:52:17 10 that you will have.

09:52:18 11 With respect to the e-mails, I think this  
09:52:20 12 is not the time or the place for a discussion of the  
09:52:23 13 e-mails. I certainly am not prepared to go into it.  
09:52:27 14 But defendants would reject any suggestion that  
09:52:31 15 sanctions would be appropriate. And I just want  
09:52:33 16 to make that clear for the record.

09:52:34 17 And, finally, my understanding is that,  
09:52:36 18 at some point, the witness -- there was a suggestion  
09:52:39 19 that this case was -- this case was brought against  
09:52:42 20 the Syrian Arab Bank, and this was brought against  
09:52:49 21 the Syrian Arab Republic.

09:52:54 22 MR. SCHOEN: When was the reference? When  
09:52:55 23 the case was announced, you mean?

09:52:58 24 MR. O'TOOLE: That's my understanding.

09:52:59 25 MR. SCHOEN: All right. I arrived here

09:53:00 1 at 9:07 today. But in any event, I e-mailed when  
09:53:03 2 I arrived -- I e-mailed Mr. McAleer when I arrived,  
09:53:07 3 to be clear.  
09:53:08 4 Okay. Anything further?  
09:53:08 5 MR. O'TOOLE: Nothing further.  
09:53:08 6 (Comment in Arabic by the witness.)  
09:53:11 7 OFFICIAL INTERPRETER BEN-NAIM: The witness  
09:53:12 8 wants water.

09:53:46 9 THE WITNESS: Can I comment on what --

09:53:53 10 OFFICIAL INTERPRETER AGHAZARIAN: You can  
09:53:53 11 comment on whatever you like.

09:53:53 12 MR. SCHOEN: I'm not sure I understand.

09:53:47 13 OFFICIAL INTERPRETER AGHAZARIAN: "On the  
09:53:48 14 delay -- can I make a comment on the delay?"

09:53:53 15 The witness is asking.

09:53:54 16 MR. SCHOEN: Sure. If you'd like to, sure.

09:53:55 17 THE WITNESS: (Translated.) First of all,  
09:53:58 18 I apologize for the delay. But this delay was outside  
09:54:05 19 my weight [sic] for two reasons.

09:54:15 20 The first, that I have heard yesterday night  
09:54:19 21 that the plaintiffs asked for a delay of the deposition.  
09:54:29 22 My readiness this morning as such was not sufficient  
09:54:34 23 to come on the specified time, because I was informed  
09:54:42 24 only this morning that the date is fixed.

09:54:47 25 In addition, we were delayed on the Israeli

09:54:54 1 roadblock not less than 20 minutes.

09:54:59 2 (In English.) I'm sorry.

09:55:03 3 MR. SCHOEN: No problem. And I can tell you  
09:55:06 4 that the plaintiffs did not ask that the deposition be  
09:55:09 5 delayed.

09:55:13 6 MR. O'TOOLE: And I'd like to make very clear  
09:55:15 7 that the plaintiff suggested that the depositions may  
09:55:22 8 be canceled --

09:55:22 9 OFFICIAL INTERPRETER BEN-NAIM: Sir, you  
09:55:22 10 should raise your voice, please, a little bit.

09:55:22 11 MR. O'TOOLE: I'd like to be very clear that  
09:55:22 12 the plaintiffs did suggest that the depositions would  
09:55:22 13 be either canceled or delayed late last night. And we  
09:55:26 14 did not hear until 4:00 o'clock this morning that the  
09:55:30 15 depositions were definitely on.

09:55:33 16 MR. SCHOEN: Again, the e-mails speak for  
09:55:35 17 themselves. And I addressed that point in the morning  
09:55:39 18 e-mail, in which I said -- I simply asked the question  
09:55:41 19 and did not say -- and specifically said, in the e-mail  
09:55:44 20 in which I raised question, that I didn't know if it  
09:55:47 21 would be logistically possible even to move the e-mails  
09:55:51 22 [sic] and that I hadn't checked to see that it could be  
09:55:54 23 and that I had no way to check to see that it could be.

09:56:00 24 And in the response that I received, I was  
09:56:04 25 advised that Mr. McAleer did not know whether witnesses

09:56:08 1 would be available to do it, if we changed the dates.

09:56:18 2 MR. O'TOOLE: The record is what it is.

09:56:20 3 And from our perspective, I think it can only show  
09:56:25 4 considerable confusion about whether this deposition  
09:56:30 5 would occur and the place and time. But the fact  
09:56:32 6 is that the minister is here. He's here and he is  
09:56:36 7 available for questioning.

09:56:37 8 Q. BY MR. SCHOEN: May I have your full name,  
09:56:40 9 please?

09:56:41 10 A. Nadime Aref Al-Barahme.

09:56:41 11 Q. How old are you, sir?

09:56:50 12 A. 52 -- 54 -- sorry. 54 years old.

09:56:54 13 Q. Tell me how I should call you, because I may  
09:56:59 14 not pronounce it correctly. Mister --

09:57:02 15 A. (In English.) Just Nadime. Just Nadime.

09:57:06 16 Q. And I'm David.

09:57:10 17 Nadime, where do you live?

09:57:15 18 A. Ramallah.

09:57:16 19 Q. How long have you lived there?

09:57:21 20 A. All the time since 1994.

09:57:26 21 Q. And before 1994?

09:57:29 22 A. In Amman, Jordan.

09:57:32 23 Q. Where were you born?

09:57:37 24 A. In Anza. In Anza, Jenin district, in the  
09:57:43 25 West Bank. Anza.

09:57:43 1 Q. So you were born in the West Bank?

09:57:47 2 A. Yes.

09:57:48 3 Q. And at what age did you leave there?

09:57:55 4 A. I was almost 11. I left on the background  
09:58:03 5 of the 1967 war, when Israel occupied the West Bank.

09:58:10 6 Q. Did you move to Amman then?

09:58:14 7 A. Yes. Correct.

09:58:15 8 Q. So is it accurate to say the only places you  
09:58:22 9 have lived during your life are Jenin, or the Jenin area  
09:58:33 10 in the West Bank; Amman, Jordan; and Ramallah?

09:58:46 11 A. There were some exceptions, like I studied my  
09:58:50 12 university studies in Morocco.

09:58:55 13 Q. Any other exceptions come to mind?

09:59:00 14 A. Not permanent living.

09:59:03 15 Q. Okay. Nadime, do you speak or understand  
09:59:11 16 English?

09:59:14 17 A. A little bit I understand, but I prefer to  
09:59:18 18 speak in Arabic.

09:59:20 19 Q. You feel you need the translator?

09:59:24 20 A. Yes.

09:59:25 21 Q. I would just ask you -- and I know you're  
09:59:28 22 somewhat familiar with the proceedings -- to speak in  
09:59:35 23 short bites and let him translate, and then speak again.

09:59:46 24 A. Okay.

09:59:46 25 Q. All right. You live in a house or an

09:59:49 1 apartment?

09:59:54 2 A. Apartment.

09:59:55 3 Q. Who pays for that apartment?

10:00:02 4 A. I am the owner of this apartment.

10:00:04 5 Q. I see. Does the -- are you employed by the  
10:00:08 6 PA?

10:00:15 7 A. Yes, of course I am.

10:00:17 8 Q. During the course of this deposition, I'm  
10:00:20 9 going to use the term "PA" the same as "PNA," if that's  
10:00:26 10 okay with you.

10:00:41 11 A. Okay.

10:00:42 12 Q. Some witnesses have been saying "PA," some  
10:00:45 13 have said "PNA."

10:00:54 14 Okay. Does the PA pay any expenses on your  
10:00:59 15 apartment?

10:00:59 16 A. Correct. They pay the water bill, as  
10:01:14 17 long as it is not more than 600 shekels per month,  
10:01:18 18 electricity that does not exceed also 600 shekels a  
10:01:24 19 month, and the telephone bill, as long as it doesn't  
10:01:30 20 exceed 500 shekels.

10:01:34 21 Q. Do you have a car?

10:01:37 22 A. I have an official car.

10:01:39 23 Q. Meaning a car that the PA pays for?

10:01:51 24 A. It is an official car which is registered  
10:01:53 25 in the name of the PA.

10:01:56 1 Q. Does the PA provide you with a driver?

10:02:00 2 A. Yes.

10:02:00 3 Q. Okay. How about your family, does your family

10:02:05 4 have any paid benefits from the PA?

10:02:15 5 A. No.

10:02:17 6 Q. Do you have a family?

10:02:19 7 A. Yes.

10:02:20 8 Q. How many kids?

10:02:29 9 A. Three boys and one girl.

10:02:31 10 Q. Where did you go to school, starting from

10:02:36 11 elementary school and as far as you went?

10:02:40 12 A. The elementary school in the West Bank, the

10:02:45 13 preparatory phase in Jordan, and secondary as well in

10:02:51 14 Jordan. Then my university phase, that was in Morocco.

10:02:57 15 Q. Which university in Morocco?

10:03:03 16 A. The University of Muhammad Bin Abdullah in

10:03:07 17 the city of Fez.

10:03:12 18 Q. How far did you go in school? One university

10:03:14 19 degree or a law degree?

10:03:16 20 A. BA.

10:03:18 21 Q. In what field?

10:03:21 22 A. Law. And I have a license to practice the

10:03:31 23 profession from the Jordanian bar association and the

10:03:37 24 Palestinian bar association as well.

10:03:40 25 Q. Any other bar association?

10:03:43 1 A. No.

10:03:48 2 Q. How are you employed?

10:03:53 3 A. In the PA.

10:03:59 4 Q. Right now, what's your job?

10:04:01 5 A. I am the head of the Palestinian Land  
10:04:02 6 Authority.

10:04:07 7 Q. How long have you been the head of the  
10:04:08 8 Palestinian Land Authority?

10:04:16 9 A. From 2008 until now.

10:04:19 10 Q. What is the responsibility, if you can  
10:04:22 11 summarize it, of the Palestinian Land Authority?

10:04:35 12 A. Land Authority documents and registers,  
10:04:39 13 is involved in registering the lands. And it has  
10:04:45 14 to do with the space of each estate, in addition to  
10:04:58 15 settlement and fixing up the property rights through  
10:05:02 16 the "tabu," if it hasn't been done before, in addition  
10:05:10 17 to supervising and managing public properties.

10:05:16 18 Q. And the land that comes under your  
10:05:19 19 jurisdiction encompasses what area? All of Area A or --

10:05:33 20 A. A and B.

10:05:35 21 Q. And as the chair of the -- as the head of  
10:05:39 22 the Palestinian Land Authority, is it fair to say that  
10:05:46 23 you're responsible for all of the operations of that  
10:05:49 24 agency?

10:05:56 25 A. Correct.



10:05:57 1 Q. Before 2008, how were you employed?

10:06:03 2 A. In the Ministry of Finance.

10:06:05 3 How I was employed?

10:06:10 4 Q. You were the legal counsel for the Ministry

10:06:12 5 of Finance; correct?

10:06:15 6 A. Yes.

10:06:16 7 Q. When did you start in that position?

10:06:21 8 A. 1994.

10:06:26 9 Q. And tell me what the Ministry of Finance is

10:06:31 10 responsible for.

10:06:37 11 A. Like any finance ministry in the world,

10:06:44 12 it is in charge of regulating the annual budget and

10:06:51 13 managing it and in charge of revenues and expenditures,

10:07:01 14 the taxes, and the customs.

10:07:04 15 Q. And how about developing the budget, who

10:07:08 16 creates the budget for the PA?

10:07:19 17 A. First, the budget is prepared in the Ministry

10:07:22 18 of Finance. And there is a law -- there are bylaws,

10:07:28 19 referring to the general budget.

10:07:34 20 Q. Bylaws of the PA?

10:07:39 21 A. Oh, yes.

10:07:39 22 Q. Where are those bylaws found? Do you know?

10:07:52 23 A. There is a website called Muqtafi --

10:07:54 24 OFFICIAL INTERPRETER AGHAZARIAN: Muqtafi,

10:07:54 25 with a "Q."

10:07:55 1 THE WITNESS: -- which is part of Bir Zeit  
10:07:59 2 University website. There is also the encyclopedia of  
10:08:07 3 all the Palestinian laws.

10:08:10 4 Q. BY MR. SCHOEN: Also on the Bir Zeit website?

10:08:19 5 A. The Law Institute, which pertains to Bir Zeit  
10:08:22 6 University.

10:08:24 7 Q. Is there an official website of the  
10:08:28 8 Palestinian Authority?

10:08:32 9 A. There are websites. Every ministry has its  
10:08:37 10 own site, most of the ministries.

10:08:41 11 Q. And is there any one central website for the  
10:08:45 12 Palestinian Authority?

10:08:46 13 A. I don't know.

10:08:50 14 Q. You started at the Ministry of Finance in  
10:08:53 15 1994?

10:08:59 16 A. Correct.

10:09:00 17 Q. When did you finish your schooling, what year?

10:09:09 18 A. University?

10:09:12 19 Q. Yes.

10:09:15 20 A. 1979, my BA.

10:09:22 21 And for one year, I have studied at the  
10:09:26 22 National Institute For Judiciary Affairs in Rabat.  
10:09:40 23 This was -- I was supposed to be there at this judiciary  
10:09:42 24 institute for two years. But for personal reasons, I  
10:09:49 25 stayed only one year, and I left.

10:09:51 1 Q. That was just after law school?

10:09:55 2 A. Yes.

10:09:55 3 Q. All right. So that's around 1980, 1981?

10:10:01 4 A. Yes.

10:10:02 5 Q. Between that period and 1994, do you remember  
10:10:08 6 the jobs that you had?

10:10:14 7 A. For sure. After Morocco, I headed to Jordan,  
10:10:25 8 and I was an intern as a lawyer for a couple years.  
10:10:32 9 And after finishing, I had my private law firm until --  
10:10:38 10 until 1994. When the PA came, I came with them.

10:10:47 11 Q. Where was that private law firm?

10:10:50 12 A. Amman.

10:10:51 13 Q. Nadime, excuse me for asking this, but have  
10:11:04 14 you ever been arrested?

10:11:06 15 A. No.

10:11:07 16 Q. Never been detained?

10:11:22 17 A. No.

10:11:24 18 Q. You're not being paid specially to appear  
10:11:27 19 here today; right?

10:11:31 20 A. Certainly not.

10:11:46 21 Q. I'm sorry. One other ground rule I'd like  
10:11:50 22 to discuss with you -- and your lawyer can disagree  
10:11:54 23 if he disagrees.

10:12:02 24 Do you understand, that during the deposition,  
10:12:07 25 when we have a break, you are not to discuss your

10:12:13 1 testimony with anyone?

10:12:23 2 MR. O'TOOLE: And I would like to object  
10:12:25 3 to that comment, because the law in the District  
10:12:28 4 of Columbia is very clear that witnesses can discuss  
10:12:32 5 at least parts of their testimony with their lawyers  
10:12:35 6 during breaks. They cannot discuss answers to pending  
10:12:39 7 questions during the break. But, otherwise, they  
10:12:41 8 are free to consult with their lawyers, and the  
10:12:47 9 conversations are privileged.

10:12:49 10 Q. BY MR. SCHOEN: With whom -- sorry.

10:12:50 11 You were told you would be testifying today  
10:12:52 12 about certain subjects?

10:13:03 13 A. Not specific, but I was told that there  
10:13:06 14 is a case that -- that has been raised in the United  
10:13:11 15 States and that I will be asked about questions related  
10:13:19 16 to my studies and my work.

10:13:22 17 Q. And do you understand that the PA has picked  
10:13:26 18 certain witnesses to testify about certain subjects?

10:13:43 19 A. Yes, I know that.

10:13:45 20 Q. What, if anything, did you do to prepare to  
10:13:47 21 testify today?

10:13:48 22 MR. O'TOOLE: I'm going to object to this  
10:13:51 23 question to the extent that it calls for any sort of  
10:13:56 24 communications with his attorneys in connection with  
10:13:58 25 the preparation.

10:13:59 1 I'm going to instruct the witness not to  
10:14:02 2 provide any sort of information in his answer that  
10:14:05 3 would reflect attorney/client privileged communications  
10:14:09 4 but, otherwise, allow him to answer the question.

10:14:30 5 Q. BY MR. SCHOEN: In preparing to testify today,  
10:14:32 6 did you look at any documents?

10:14:43 7 A. Yes, one document.

10:14:45 8 Q. What document did you look at?

10:14:54 9 A. A document for a rent contract for an amount  
10:15:01 10 that has been paid from the Ministry of Finance.

10:15:06 11 Q. A rent contract for the PFLP office in  
10:15:12 12 Kalkilya?

10:15:13 13 CHECK INTERPRETER HAZOU: "Kalkilya."

10:15:13 14 OFFICIAL INTERPRETER AGHAZARIAN: "In  
10:15:13 15 Kalkilya."

10:15:15 16 OFFICIAL INTERPRETER BEN-NAIM: Sorry.

10:15:19 17 Q. BY MR. SCHOEN: Yes?

10:15:21 18 A. Yes.

10:15:21 19 Q. All right. We'll discuss that in a moment.

10:15:25 20 Other than your attorneys, did you speak with  
10:15:28 21 anyone to prepare for your testimony today?

10:15:39 22 MR. SCHOEN: Don't answer yet. Your attorney  
10:15:40 23 is --

10:15:42 24 MR. O'TOOLE: I'm going to object to  
10:15:43 25 that question to the extent that it calls for any

10:15:47 1 communications within the attorney/client team, and  
10:15:49 2 that includes agents of the attorneys.

10:15:52 3 To the extent that it calls for information  
10:15:55 4 outside the attorney/client privilege, I'm going  
10:15:57 5 to allow the witness to answer. Although I would  
10:16:01 6 respectfully ask counsel to rephrase the question  
10:16:03 7 to try and eliminate that sort of information.

10:16:09 8 MR. SCHOEN: Well, I think one way to  
10:16:11 9 deal with that would be to ask him who he spoke with.  
10:16:14 10 Because I don't think the fact that he spoke with an  
10:16:17 11 attorney is privileged. I think the contents of the  
10:16:21 12 discussion would be.

10:16:24 13 So from my perspective, to the extent he names  
10:16:27 14 an attorney, I won't inquire into those discussions.  
10:16:35 15 It may be that he didn't speak to anyone other than  
10:16:38 16 his attorney, but I don't know. I'd like to find  
10:16:42 17 that out, other than what you have defined as his  
10:16:45 18 attorney, meaning his attorney or someone who shares  
10:16:48 19 the attorney/client privilege with that -- with his  
10:16:51 20 attorney.

10:17:03 21 MR. O'TOOLE: And I will allow the witness  
10:17:05 22 to answer that question but will reserve the right to  
10:17:08 23 object immediately, to the extent that it elicits any  
10:17:11 24 attorney/client privilege.

10:17:23 25 Q. BY MR. SCHOEN: Who, if anyone, did you speak

10:17:26 1 with to prepare for your testimony today? And I'm just  
10:17:36 2 asking who now, not what you discussed.

10:17:46 3 A. With the lawyers that represent us, we had  
10:17:50 4 two sessions, accompanied by attorney Osama Saadi.  
10:18:04 5 And my English is poor, so to overcome --

10:18:09 6 MR. O'TOOLE: And I would interject here,  
10:18:11 7 because I believe that the rest of this answer is  
10:18:14 8 discussing or describing reasons for the people in  
10:18:19 9 the room, which I think is privileged. And I would  
10:18:26 10 instruct the witness not to provide such information.

10:18:34 11 Q. BY MR. SCHOEN: If there was another person  
10:18:36 12 in the room, not a lawyer --

10:18:40 13 A. Just let me tell you: In addition to  
10:18:48 14 Mrs. Fadia Shayeb, who is the comptroller of the  
10:18:53 15 accounts in the Ministry of Finance, I have on the  
10:19:00 16 phone inquired about certain issues related -- which  
10:19:08 17 is related to this contract that has been exposed to me.

10:19:14 18 Q. What did you discuss with this comptroller,  
10:19:19 19 Mrs. -- I didn't catch her name?

10:19:22 20 OFFICIAL INTERPRETER AGHAZARIAN: Fadia  
10:19:22 21 Shayeb.

10:19:22 22 MR. SCHOEN: Yes.

10:19:23 23 THE WITNESS: I inquired about the -- this  
10:19:30 24 document, why there was such a bond, which is very --  
10:19:41 25 very, very easy. What's the big deal about it? There

10:19:47 1 is nothing that does not contradict with the conditions.

10:19:53 2 It fulfills the requirements.

10:19:59 3           There is a rent contract and there is a  
10:20:04 4 cutoff for taxes. And it is cleared from the internal  
10:20:10 5 monitoring of the Finance Ministry. It is clear also  
10:20:15 6 from the legal department. And it is paid for a citizen  
10:20:25 7 who is the landlady owner of the company.

10:20:29 8           Q. BY MR. SCHOEN: You understood the property  
10:20:32 9 was being used for the PFLP office?

10:20:43 10           A. It's not me as a person. But it is used by  
10:20:48 11 the PFLP. It's clearly from the rent contract that  
10:20:55 12 it is utilized by the PFLP.

10:20:58 13           Q. Why did you call this lady?

10:21:08 14           A. I mentioned because I was surprised. Why --  
10:21:16 15 what's the big deal? This is a very normal type of  
10:21:20 16 contract.

10:21:21 17           Q. My question was a bad one. I meant why this  
10:21:25 18 lady of all people? What's her job as comptroller?  
10:21:33 19 Sorry.

10:21:39 20           A. Because she works for the central accounts  
10:21:43 21 within the Finance Ministry.

10:21:46 22           Q. I see. And she would be the person who would  
10:21:49 23 know that the PA paid this rent for this office?

10:22:05 24           A. She knows after the payment is carried out.

10:22:08 25           Q. And she --



10:22:18 1 A. After executing any payment, the documents  
10:22:23 2 and the -- come to her. She is not in charge of the  
10:22:29 3 payment, but she documents it. She has the information  
10:22:33 4 after payment.

10:22:34 5 Q. And if there is a file with a contract in it,  
10:22:41 6 copies of checks that have been paid, other documents  
10:22:46 7 related to the transaction, she or her office would  
10:22:56 8 be the custodian of those documents?

10:23:05 9 A. This is correct.

10:23:08 10 But I want to point out to you something.  
10:23:15 11 When the Israeli Army made the incursions into Ramallah,  
10:23:22 12 the Ministry of Finance was also barged into. Many of  
10:23:32 13 the documents were lost as a result of this incursion.

10:23:38 14 Q. Did you understand, when you spoke to her,  
10:23:40 15 that she was looking at some documents to get the  
10:23:44 16 information she gave you?

10:23:53 17 A. Yes.

10:23:54 18 Q. And you also had some documents related to  
10:23:57 19 that transaction?

10:24:09 20 A. I didn't have anything except the only  
10:24:12 21 document that I checked into.

10:24:15 22 Q. And that document was the rent agreement?

10:24:19 23 A. Yes.

10:24:20 24 Q. So after consulting -- you read that document?

10:24:29 25 A. Yes.

10:24:29 1 Q. And you spoke with this comptroller?

10:24:33 2 A. Yes.

10:24:33 3 OFFICIAL INTERPRETER AGHAZARIAN: "Yes."

10:24:38 4 Q. BY MR. SCHOEN: And you arrived at your

10:24:40 5 conclusion about this transaction that way?

10:24:53 6 A. I didn't understand the question.

10:24:55 7 Q. Did you look at any other documents or speak

10:24:58 8 to any other people besides the attorneys?

10:25:09 9 A. No.

10:25:11 10 Q. I mean, in regard to the -- that transaction

10:25:14 11 you just spoke about, or for any other preparation for

10:25:27 12 testifying today?

10:25:37 13 A. With others? Other than the lawyers?

10:25:41 14 Q. Other than the lawyers.

10:25:42 15 A. No.

10:26:08 16 Q. Nadime, do you belong to any political

10:26:10 17 organization?

10:26:16 18 A. Yes. Fatah movement.

10:26:18 19 Q. How long have you been a member of the Fatah

10:26:21 20 movement?

10:26:23 21 A. From 1976.

10:26:26 22 Q. When did the Fatah movement start?

10:26:31 23 A. 1965.

10:26:38 24 CHECK INTERPRETER HAZOU: He said --

25 //

10:26:39 1 (Comment in Arabic by Check Interpreter  
10:26:39 2 Hazou.)

10:26:41 3 THE WITNESS: First of January.

10:26:47 4 (Court reporter clarification.)

10:26:48 5 OFFICIAL INTERPRETER AGHAZARIAN: First of  
10:26:48 6 January, '65.

10:26:50 7 Q. BY MR. SCHOEN: And have you remained a member  
10:26:52 8 of Fatah since 1976 through today?

10:26:59 9 A. '76.

10:27:01 10 MR. SCHOEN: That's what I said. I said '76.

10:27:03 11 OFFICIAL INTERPRETER BEN-NAIM: Yes. So it  
10:27:04 12 was my mistake.

10:27:07 13 Q. BY MR. SCHOEN: Sorry. So since 1976 through  
10:27:11 14 today.

10:27:11 15 A. But not a member of the military wing.

10:27:16 16 Q. A member of the Fatah movement?

10:27:18 17 A. Yes.

10:27:20 18 Q. Any other organizations you have been a member  
10:27:23 19 of, political?

10:27:25 20 A. No.

10:27:25 21 Q. And no other faction of the PLO?

10:27:31 22 A. No.

10:27:33 23 Q. Fatah is a faction of the PLO?

10:27:37 24 A. Yes.

10:27:38 25 Q. Do you know what the other factions are of

10:27:44 1 the PLO?

10:27:46 2 A. Of course.

10:27:47 3 Q. What are they?

10:27:50 4 A. Fatah, PFLP, PTFLP, the Arab Liberation Front,  
10:27:58 5 the Palestinian Liberation Front, the People's Party.

10:28:08 6 Q. Is Hamas a part of the PLO?

10:28:11 7 A. No.

10:28:11 8 Q. Islamic -- Islamic Jihad?

10:28:17 9 A. No.

10:28:25 10 Q. One of the categories that you have been  
10:28:28 11 designated to talk about today is -- I'm going to  
10:28:43 12 paraphrase it -- to provide us with all of the details  
10:28:47 13 of all of the searches that were conducted by the PA  
10:29:01 14 for documents and information that would be responsive  
10:29:13 15 to certain requests for information and documents --  
10:29:22 16 the requests for information and documents that the  
10:29:26 17 plaintiffs served on the defendant, on the PA.

10:29:48 18 Do you understand?

10:29:50 19 A. This is what's requested from me?

10:29:53 20 Q. Yes, that I'm going to ask you questions about  
10:29:57 21 those.

10:30:01 22 A. And I spoke to you with the limit of my  
10:30:07 23 knowledge.

10:30:10 24 Q. With respect to that area of questioning,  
10:30:13 25 though, did you take any steps to prepare to answer

10:30:22 1 the questions as to what steps were taken to find  
10:30:28 2 information or documents we requested?

10:30:45 3 A. Yes. For one time, when I asked about this  
10:30:52 4 document to Fadia, I asked if there were other bonds  
10:31:05 5 related to the PFLP. Her answer was that this is the  
10:31:14 6 only available document.

10:31:24 7 Q. On that specific subject, her answer was that  
10:31:34 8 that's the only available document?

10:31:40 9 A. There is a difference here. There is no  
10:31:45 10 implementation for payments. There was nothing paid  
10:31:56 11 to the PFLP except this payment.

10:31:59 12 Q. Except the payment in this transaction we're  
10:32:04 13 talking about?

10:32:16 14 A. Exactly. Because on the computer, the only  
10:32:19 15 thing which appears is the beneficiary or the person  
10:32:23 16 entering the contract. We pay for the factions, and  
10:32:38 17 of course, we assume that this definitely includes the  
10:32:43 18 payments in other towns to the PFLP.

10:32:45 19 CHECK INTERPRETER HAZOU: "Factions of the  
10:32:47 20 PLO."

10:32:49 21 MR. SCHOEN: Just make sure -- sorry. Just  
10:32:50 22 make sure it was correct on the -- I'm sure you are,  
10:32:55 23 just that we are in agreement on the -- he said  
10:32:57 24 "factions of the PLO"?

10:32:59 25 OFFICIAL INTERPRETER AGHAZARIAN: "Factions

10:32:59 1 of the PLO."

10:33:03 2 THE WITNESS: The official factions that are  
10:33:06 3 under the umbrella of the PLO, including the PFLP.

10:33:13 4 Q. BY MR. SCHOEN: And the another factions that  
10:33:16 5 you named before?

10:33:18 6 A. Yes. The official factions of the PLO.

10:33:22 7 Q. Yes. When you say you pay for the factions,  
10:33:25 8 there is a certain amount of money allotted to each  
10:33:28 9 faction each month?

10:33:39 10 A. To the best of my knowledge, no. But this has  
10:33:48 11 to do with the limited financial resources. But there  
10:33:53 12 is nothing wrong with this. In Israel, they pay to all  
10:33:58 13 factions, including the opposition.

10:34:00 14 Q. I'm not suggesting there's anything wrong.  
10:34:03 15 I'm just asking how the structure works.

10:34:07 16 Since the start of the PA, isn't it true that  
10:34:10 17 the PA makes regular payments to each of the factions of  
10:34:18 18 the PLO?

10:34:23 19 A. Within the reasonable limits. It's like rents  
10:34:38 20 for offices, all faction headquarters.

10:34:44 21 Q. When you say "within reasonable limits," you  
10:34:47 22 mean --

10:34:49 23 A. Within also the means that are available.

10:34:52 24 Q. Meaning the amount -- if there is only a  
10:34:57 25 certain amount of money available, the PA can only --

10:35:01 1 the PA can only pay a certain amount of money?

10:35:09 2 A. This is an aspect. There is another aspect  
10:35:13 3 that has been agreed upon, that the PLO is responsible  
10:35:23 4 for these factions, and it provides the minimum  
10:35:28 5 requirement of its expenditure, including the rent  
10:35:32 6 of the offices.

10:35:33 7 Q. For each of the factions?

10:35:36 8 A. Yes.

10:35:37 9 Q. The PA is responsible for paying those  
10:35:41 10 expenses?

10:35:41 11 OFFICIAL INTERPRETER BEN-NAIM: "The PA"?

10:35:54 12 Q. BY MR. SCHOEN: The PA is responsible for  
10:35:55 13 paying those expenses?

10:35:55 14 A. The PA is part and it follows --

10:36:00 15 MR. SCHOEN: It's what?

10:36:01 16 OFFICIAL INTERPRETER AGHAZARIAN: "It's part  
10:36:04 17 of the PLO."

10:36:05 18 Q. BY MR. SCHOEN: The PA runs the Finance  
10:36:07 19 Ministry, for example?

10:36:11 20 A. Correct. But the PA has -- has been  
10:36:20 21 established in the first place as a result of an  
10:36:25 22 agreement with the PLO.

10:36:27 23 Q. Yes. An agreement -- the PA was established  
10:36:29 24 as the result of an agreement between the PLO and who?  
10:36:35 25 And some other party? Between the PLO and some other --

10:36:37 1 the PA was created as a result of an agreement between  
10:36:43 2 the PLO and some other party?

10:36:53 3 A. The government of Israel.

10:36:56 4 Q. In 1994?

10:37:00 5 A. Maybe in '93.

10:37:01 6 Q. Yeah, yes.

10:37:04 7 A. (Not translated.) Oslo. Oslo.

10:37:06 8 Q. Maybe in negotiations that started in 1993?

10:37:10 9 A. No. It ended in '93. It was signed in August  
10:37:17 10 1993.

10:37:21 11 Q. Aah. But negotiations continued in '94 and  
10:37:24 12 '95?

10:37:27 13 A. Yes. Correct.

10:37:28 14 Q. And other agreements were entered into?

10:37:32 15 A. Correct.

10:37:33 16 Q. The Taba agreement, Interim Principles, and  
10:37:45 17 the Paris Protocol, I'll call it. I don't know what  
10:37:52 18 else to call it.

10:37:54 19 A. Yes.

10:37:55 20 Q. Do the bylaws of the PA or the PLO require  
10:38:02 21 the PA to pay the expenses of the factions of the PLO?

10:38:15 22 OFFICIAL INTERPRETER BEN-NAIM: The last one,  
10:38:16 23 last part of --

10:38:17 24 MR. SCHOEN: "The factions of the PLO."

10:38:19 25 (Comment in Arabic by the witness.)



10:38:20 1 MR. SCHOEN: One second. There's a  
10:38:20 2 translation issue.

10:38:20 3 CHECK INTERPRETER HAZOU: You said "expenses"?

10:38:32 4 MR. SCHOEN: Yes. Okay, I'll ask it over.  
10:38:35 5 I'll ask it over. I'll ask it again.

10:38:36 6 OFFICIAL INTERPRETER BEN-NAIM: Okay.

10:38:37 7 Q. BY MR. SCHOEN: Do the bylaws of the PA  
10:38:42 8 or the PLO require the PA to pay the expenses of  
10:38:51 9 the factions of the PLO within the limits of the  
10:39:04 10 PA financial ability -- the PA's financial ability?

10:39:13 11 A. The basic Palestinian Law safeguards the  
10:39:21 12 freedom of establishing political parties on the  
10:39:26 13 basis of political pluralism.

10:39:30 14 The PLO, as a whole, with its various  
10:39:35 15 factions, starting from Fatah, as well as the PFLP,  
10:39:41 16 before Oslo and the establishment of the PA, everybody  
10:39:47 17 knows that these were armed factions. But when the  
10:39:53 18 Oslo agreement was signed and establishing the PA  
10:40:02 19 and that the PLO has signed on it, this means that  
10:40:12 20 all the factions have to comply with this agreement.  
10:40:16 21 It's binding.

10:40:20 22 And even if some factions had reservations  
10:40:25 23 over it, so the leaders and these factions have  
10:40:32 24 entered --

10:40:33 25 MR. SCHOEN: I'm sorry. "Entered"?

10:40:36 1 OFFICIAL INTERPRETER AGHAZARIAN: "Entered."

10:40:37 2 THE WITNESS: -- to the Palestinian areas,  
10:40:40 3 to the Palestinian lands, implementing an implementation  
10:40:47 4 of this agreement. It has been transformed into unarmed  
10:40:56 5 political factions. And it is prohibited to any faction  
10:41:06 6 to engage -- to engage any armed activity or possess  
10:41:12 7 weapons. And the only weapons that are allowed are  
10:41:19 8 the weapons of the PA, as is stipulated in the signed  
10:41:27 9 agreement, the Oslo Accords, and the other relevant  
10:41:39 10 accords.

10:41:46 11 As such, the responsibility of the PLO  
10:41:50 12 emanates regarding these factions, the factions that  
10:41:57 13 were transformed after Oslo into parties.

10:42:02 14 Q. BY MR. SCHOEN: My question really was just:  
10:42:05 15 Are there bylaws that require such payments to the  
10:42:11 16 factions?

10:42:22 17 A. I did answer. There is a clear text in the  
10:42:29 18 basic law to safeguard the freedom of establishing  
10:42:36 19 political parties. These factions were transformed  
10:42:43 20 into political parties, the same like any political  
10:42:50 21 parties anywhere else in the world. And many countries  
10:42:56 22 in the world, including Israel, allocate in its budget  
10:43:05 23 annual funds to -- to -- for these parties.

10:43:13 24 We are not a state. We do not have a clear  
10:43:21 25 vision for our annual budget. We know it depends on

10:43:31 1 external assistance, and sometimes we build this budget  
10:43:35 2 based on pledges. So we will not be able to organize  
10:43:44 3 matters whereby we could control the thing like other  
10:43:50 4 countries.

10:43:53 5 And -- and we are a nascent entity. Our laws  
10:44:01 6 have not been complete yet. A large chunk of the laws  
10:44:11 7 that are applied in our situation are Jordanian laws.

10:44:18 8 Q. To summarize, is it fair to say that the PA  
10:44:22 9 makes payments to each of its factions -- to each of  
10:44:27 10 the PLO's factions, in the interest of this pluralism  
10:44:35 11 we spoke about?

10:44:46 12 Is that -- that's fair to say?

10:44:49 13 A. This is correct, but not in a regular manner.  
10:44:52 14 Not in a regular manner.

10:44:55 15 Q. Meaning they don't -- there is not a set  
10:44:57 16 amount that has to be paid every month?

10:45:07 17 A. No, there are not specific monthly  
10:45:12 18 allocations.

10:45:13 19 Q. That's what you meant by "not in a regular  
10:45:16 20 way"?

10:45:19 21 A. Yes.

10:45:20 22 Q. It could -- it happens that -- and, by the  
10:45:23 23 way, what I'm describing here, the process is the same  
10:45:27 24 from 1994 through today?

10:45:37 25 CHECK INTERPRETER HAZOU: 1999?

10:45:38 1 MR. SCHOEN: 1994. 1994.

10:45:41 2 THE WITNESS: This procedure, that it is not  
10:45:43 3 regular?

10:45:44 4 Q. BY MR. SCHOEN: The procedure of payments by  
10:45:45 5 the PA to the factions of the PLO, beginning -- began  
10:46:00 6 with the creation of the PA in 1994 -- '93 or '94?

10:46:07 7 A. Correct.

10:46:08 8 Q. And the process has continued the same through  
10:46:12 9 today?

10:46:16 10 A. I don't know if it's until now.

10:46:18 11 Q. Oh. You don't know today?

10:46:23 12 A. I'm speaking about the period when I was  
10:46:26 13 working in the Ministry of Finance.

10:46:28 14 Q. That means from '94 until 2008?

10:46:33 15 A. Yes.

10:46:38 16 MR. SCHOEN: Oh, I'm sorry. We have to switch  
10:46:40 17 the tape.

10:46:42 18 THE VIDEOGRAPHER: Going off the record at  
10:46:44 19 10:46.

11:02:02 20 (Recess from 10:46 a.m. to 11:00 a.m.)

11:02:03 21 THE VIDEOGRAPHER: Going back on the record  
11:02:05 22 at 11:00.

11:02:08 23 Q. BY MR. SCHOEN: Nadime, who is Sami Ramlawi?

11:02:15 24 A. Sami Ramlawi was an employee in the Ministry  
11:02:22 25 of Finance. He was director general of the Ministry

11:02:29 1 of Finance in the West Bank.

11:02:33 2 Q. Is there a Ministry of Finance in the West  
11:02:34 3 Bank -- is there another Ministry of Finance under the  
11:02:41 4 PA or just this Ministry of Finance that you were --

11:02:45 5 A. No. It is one ministry before the division  
11:03:05 6 occurred, the Hamas "putsch." But there used to be  
11:03:22 7 headquarters for the Ministry of Finance in Gaza as  
11:03:25 8 well as in the West Bank, for logistic reasons. One  
11:03:31 9 minister runs both and one director general of the  
11:03:35 10 ministry. But like most mother ministries, you have  
11:03:45 11 a director general for the West Bank and another one  
11:03:51 12 in the Ministry of Finance in Gaza.

11:03:54 13 Q. When was the Hamas "putsch"?

11:03:59 14 A. 2007.

11:04:01 15 Q. All right. So between -- well, when did Sami  
11:04:05 16 Ramlawi start as the Ministry of Finance?

11:04:12 17 A. I think in 1994.

11:04:15 18 Q. And was he the director general in 1994, if  
11:04:19 19 you remember?

11:04:27 20 A. I think so.

11:04:28 21 Q. Until when?

11:04:41 22 A. Around 2005.

11:04:50 23 Q. And you were the legal counsel to the Ministry  
11:04:53 24 of Finance during some of that period?

11:04:57 25 (Pending question partially translated.)

11:04:58 1 CHECK INTERPRETER HAZOU: "Legal counsel," you  
11:05:00 2 said?  
11:05:03 3 MR. SCHOEN: Yes.  
11:05:04 4 OFFICIAL INTERPRETER BEN-NAIM: "Legal"?  
11:05:04 5 MR. SCHOEN: "Legal counsel."  
11:05:05 6 (Pending question partially translated.)  
11:05:08 7 OFFICIAL INTERPRETER BEN-NAIM: "In that  
11:05:09 8 period"?  
11:05:10 9 MR. SCHOEN: "During that period."  
11:05:11 10 (Remainder of pending question translated.)  
11:05:11 11 THE WITNESS: Yes.  
11:05:12 12 Q. BY MR. SCHOEN: When Ramlawi was director  
11:05:15 13 general?  
11:05:15 14 A. Yes.  
11:05:16 15 Q. You knew him well?  
11:05:19 16 A. Yes.  
11:05:22 17 Q. What was the authority of the position that  
11:05:24 18 he had as the director general?  
11:05:36 19 A. It is executive mandate and responsibilities.  
11:05:41 20 Q. He was responsible for all of the employees  
11:05:44 21 of the Ministry of Finance?  
11:05:46 22 A. I said in the West Bank.  
11:05:54 23 Q. I'm sorry. In the West Bank.  
11:06:01 24 A. According to the administrative hierarchy,  
11:06:06 25 yes. In the administrative structure of the Ministry

11:06:12 1 of Finance, most employees are under his command. And  
11:06:27 2 he, in turn, is responsible to the director general,  
11:06:34 3 and the director general to the minister, to the deputy  
11:06:39 4 minister, and the director general follows the minister.

11:06:47 5 CHECK INTERPRETER HAZOU: I think --

11:06:47 6 (Comment in Arabic by Check Interpreter  
11:06:47 7 Hazou.)

11:06:49 8 CHECK INTERPRETER HAZOU: -- is deputy  
11:06:50 9 minister. Deputy minister. This is why you got  
11:06:54 10 a bit confused.

11:06:55 11 Q. BY MR. SCHOEN: Ramlawi -- I mean Sami Ramlawi  
11:06:57 12 whenever I say "Ramlawi" here.

11:07:05 13 Ramlawi, from '94 until 2005, around, was the  
11:07:11 14 director general of the Ministry of Finance in the West  
11:07:24 15 Bank?

11:07:24 16 (Comment in Arabic by Check Interpreter  
11:07:24 17 Hazou.)

11:07:25 18 THE WITNESS: Director general. He was not  
11:07:27 19 deputy minister.

11:07:29 20 CHECK INTERPRETER HAZOU: Exactly. He said  
11:07:29 21 "was the director general," which is --

11:07:32 22 (Brief exchange in Arabic between Official  
11:07:32 23 Interpreter Ben-Naim and Check Interpreter Hazou.)

11:07:32 24 CHECK INTERPRETER HAZOU: Not the deputy. The  
11:07:33 25 deputy minister is --

11:07:35 1 (Comment in Arabic by Check Interpreter  
11:07:35 2 Hazou.)

11:07:35 3 THE WITNESS: I tell him, you know, that he  
11:07:45 4 was never deputy minister, from the outset.

11:07:49 5 Q. BY MR. SCHOEN: Yes, we're straight.

11:07:53 6 Ramlawi was director general of the Ministry  
11:07:55 7 of Finance in the West Bank from '94 until around 2005?

11:08:02 8 A. Correct.

11:08:06 9 Q. And that's the top guy in the Ministry of  
11:08:08 10 Finance in the West Bank?

11:08:15 11 A. No. He is not on top of the pyramid. As I  
11:08:23 12 mentioned, you have a minister, then you have deputy  
11:08:28 13 minister. This is for both sides, in the Gaza and the  
11:08:36 14 West Bank. Then you have two director generals. And  
11:08:44 15 since the deputy minister lives in the West Bank, on top  
11:08:52 16 of the ministry during this given period, from '94 until  
11:08:59 17 after 2005, for -- was the deputy minister in carrying  
11:09:10 18 out the daily kind of tasks.

11:09:13 19 Q. Okay. So during the period when he was  
11:09:15 20 director general, Ramlawi answered to the deputy  
11:09:22 21 minister --

11:09:22 22 (Brief exchange in Arabic among Official  
11:09:22 23 Interpreter Aghazarian, Official Interpreter  
11:09:22 24 Ben-Naim, Check Interpreter Hazou, and the  
11:09:22 25 witness.)



11:09:31 1 Q. BY MR. SCHOEN: -- and the minister of  
11:09:37 2 finance?

11:09:39 3 A. Yes.

11:09:39 4 Q. Okay. In the years 1999 to 2002, who was the  
11:09:48 5 minister of finance?

11:09:52 6 A. Muhammad Zuhdi Nashashibi.

11:09:59 7 Q. And who was the deputy minister of finance?

11:10:03 8 A. Dr. Atef Alawneh.

11:10:03 9 OFFICIAL INTERPRETER BEN-NAIM: Hold on. I  
11:10:03 10 should write for her.

11:10:03 11 (Brief exchange in Arabic among Official  
11:10:03 12 Interpreter Aghazarian, Official Interpreter  
11:10:03 13 Ben-Naim, and the witness.)

11:10:03 14 OFFICIAL INTERPRETER BEN-NAIM: Sorry.

11:10:23 15 Q. BY MR. SCHOEN: As the director general of the  
11:10:26 16 Ministry of Finance in the West Bank, was -- what were  
11:10:34 17 Ramlawi's job duties, as you understand them?

11:10:45 18 A. He was in charge of the Treasury, in the  
11:10:53 19 sense that he is in charge of the expenditure and  
11:10:58 20 payments. And, clearly, he had the signature right  
11:11:05 21 for the Ministry of Finance transactions. But he is  
11:11:12 22 not entitled himself to spend. According to the law,  
11:11:22 23 it is the specialized minister that is entitled to have  
11:11:27 24 the signature, or if he delegates somebody to do that.  
11:11:38 25 And the person entitled during that period, through the

11:11:44 1 minister, was the deputy minister.

11:11:48 2 Q. And so Ramlawi's job duties, you say he was in  
11:11:54 3 charge of the Treasury?

11:12:05 4 A. Implementing payments that come out from the  
11:12:07 5 ministry.

11:12:08 6 Q. Okay.

11:12:09 7 CHECK INTERPRETER HAZOU: No, no, no. "From  
11:12:10 8 the Treasury."

11:12:11 9 (Brief exchange in Arabic between Check  
11:12:11 10 Interpreter Hazou and the witness.)

11:12:11 11 THE WITNESS: From the Treasury.

11:12:16 12 Q. BY MR. SCHOEN: What other job duties, if any,  
11:12:19 13 did he have?

11:12:26 14 A. The normal administrative procedures for the  
11:12:32 15 clerks, according to the civil service bylaws and the  
11:12:40 16 bylaws of the Ministry of Finance.

11:12:45 17 Q. If someone wanted to make a request for  
11:12:48 18 payment from the Treasury, as a matter of law, as  
11:12:57 19 you understood it as a legal counsel, would Ramlawi  
11:13:05 20 be the person for that person to make the request to?

11:13:19 21 A. No.

11:13:21 22 Q. Who would that person make -- if, let's say,  
11:13:25 23 a member of a faction wanted some money paid to that  
11:13:31 24 person from the PA Treasury -- by the way, I want to  
11:13:42 25 be clear. I'm not asking you yet whether Ramlawi had

11:13:49 1 the final authority to approve payment. I'm just asking  
11:14:01 2 if -- if he would be the appropriate person for a person  
11:14:09 3 who is requesting money from the Treasury to present  
11:14:14 4 his request to.

11:14:22 5 A. To make the application where? You mean  
11:14:28 6 Ramlawi, where to make the demand?

11:14:33 7 Q. I wasn't clear, I'm sure, in my question.  
11:14:37 8 Sorry.

11:14:40 9 A person wants money paid by the PA for an  
11:14:45 10 expense, let's say a faction's expense. Would that  
11:14:54 11 person go to Ramlawi, appropriately under the law, to  
11:15:03 12 make the request for the payment of those expenses, if  
11:15:10 13 he wanted the PA to make the payment for the expenses?

11:15:25 14 A. No.

11:15:28 15 Q. Would Ramlawi have any role in the process of  
11:15:32 16 considering a request for payment by the PA?

11:15:40 17 A. To start, no. If an application is presented  
11:15:59 18 from certain individuals, they go to the person that  
11:16:04 19 is entitled to order the expenditure -- the payment.  
11:16:12 20 And with the approval of the person who is delegated  
11:16:16 21 to approve the payment, they head to Sami Ramlawi only  
11:16:24 22 for implementation.

11:16:29 23 Q. Okay. Just give me one second.

11:16:32 24 A. I can also add something. This application  
11:17:14 25 could start from President Arafat, being responsible

11:17:20 1 for all people.

11:17:22 2 Q. I'm not sure what you mean by the  
11:17:24 3 "application."

11:17:24 4 In other words, if President Arafat needed  
11:17:30 5 to make a request for payment from the Treasury, he  
11:17:42 6 would need to ask someone in the Finance Ministry?

11:17:45 7 A. If he wants personally, you mean?

11:17:56 8 Q. I don't know. I thought you said this also  
11:17:57 9 is the same for --

11:18:01 10 A. No, no, I didn't say that. I said that  
11:18:06 11 the person requesting funds makes an application.  
11:18:14 12 He could go directly to President Arafat. And after  
11:18:23 13 Arafat approves such an application, refers it to the  
11:18:27 14 Ministry of Finance. In addition, people could apply  
11:18:36 15 with the minister of finance and the process with the  
11:18:40 16 same procedures.

11:18:45 17 Q. Okay. Sami Ramlawi's stopped in his position  
11:18:50 18 as director of -- director general of the Ministry of  
11:18:52 19 Finance around 2005?

11:19:02 20 A. Yes.

11:19:03 21 Q. Do you know why he -- did he resign from his  
11:19:07 22 position? Did he quit?

11:19:18 23 A. He did not resign to start with. But after  
11:19:26 24 Salam Fayyad was assigned to be the minister of finance,  
11:19:41 25 he had a new approach in running the ministry. So he

11:19:47 1 recruited teams that he deems can serve him better.

11:19:55 2 Q. Do you know where Sami Ramlawi is today?

11:20:05 3 A. I know from the press and what have you that  
11:20:10 4 he is in Amman.

11:20:12 5 Q. And do you know if Sami Ramlawi is suspected  
11:20:16 6 of having committed some crimes?

11:20:21 7 A. Yes.

11:20:22 8 Q. What crimes, if you know?

11:20:25 9 A. Corruption.

11:20:29 10 Q. Corruption from when he was working in the  
11:20:31 11 Ministry of Finance?

11:20:34 12 A. Yes.

11:20:34 13 Q. Now, you were legal counsel at the time he  
11:20:37 14 was director general?

11:20:46 15 A. Yes.

11:20:47 16 Q. Are you aware of anything illegal that Sami  
11:20:49 17 Ramlawi did while he was director general of the  
11:20:56 18 Ministry of Finance?

11:21:03 19 A. No.

11:21:06 20 Q. You are familiar with Sami Ramlawi's work when  
11:21:10 21 he was director general?

11:21:24 22 A. No, I don't know all the kind of activities he  
11:21:30 23 was doing. I don't know -- I don't know all activities  
11:21:40 24 conducted in the Ministry of Finance, except in the  
11:21:43 25 range of my direct work.

11:21:45 1 Q. Do you know what kind of work Sami Ramlawi is  
11:21:49 2 doing now?

11:21:49 3 A. No.

11:21:56 4 Q. When is the last time you recall speaking to  
11:22:00 5 Sami Ramlawi?

11:22:06 6 A. From the last day that he has quit the  
11:22:09 7 Ministry.

11:22:11 8 Q. Do you recall or are you aware of the nature  
11:22:15 9 of the corruption he's suspected of?

11:22:22 10 A. No.

11:22:47 11 MR. SCHOEN: Okay. The next subject is going  
11:22:49 12 to be a long subject, so -- the next subject could be  
11:22:50 13 a little bit long. I'm just trying to think what's  
11:22:58 14 best for you. I don't eat lunch, so it's not a factor  
11:23:02 15 for me. I think it's too early now. It's too early  
11:23:04 16 now, yeah? Yeah. So let's just continue with this.

11:23:12 17 How much time is left on the tape?

11:23:15 18 THE VIDEOGRAPHER: About 40 minutes.

11:23:18 19 MR. SCHOEN: Okay. Okay.

11:23:34 20 Q. BY MR. SCHOEN: I want to return to the  
11:23:36 21 subject I started to talk about before, but I want  
11:23:41 22 to be clear about what I'm asking.

11:23:54 23 Again, one of the subjects that you were  
11:23:58 24 designated to testify about today was to give the  
11:24:08 25 full details of the searches that were made to find

11:24:17 1 information or documents that the plaintiffs asked  
11:24:26 2 the defendants for. So my questions to you are going  
11:24:44 3 to be simply to ask you what steps were taken, what  
11:25:00 4 the details are of any and all searches that were made  
11:25:15 5 to find this information or documents.

11:25:24 6 A. Regarding what?

11:25:27 7 Q. I'll ask you each thing individually.

11:25:37 8 First of all, are you familiar with the term  
11:25:40 9 "interrogatories" at all?

11:25:43 10 A. No.

11:25:49 11 Q. Okay. It's a technical term that they use  
11:25:52 12 in the United States for one way in which information  
11:26:00 13 is requested.

11:26:07 14 Do you know what, if any, searches were made  
11:26:16 15 to determine what money -- I'm just talking about money  
11:26:22 16 now -- was paid by the PA or PLO for any purpose between  
11:26:43 17 1998 -- I'm sorry, I'm sorry -- between February 16,  
11:26:49 18 1998, and February 16 -- and February 16, 2002?

11:27:07 19 MR. O'TOOLE: I'm going to object here. He's  
11:27:09 20 the designee of the PA. He certainly can speak if he  
11:27:13 21 has any knowledge about the PLO. And I think that was  
11:27:17 22 part of your question, but I just want to make clear  
11:27:21 23 that he is the designee of the PA, not the PLO.

11:27:44 24 MR. SCHOEN: Respectfully, he is the designee  
11:27:49 25 under 19. And 19 refers to all -- each of the discovery

11:27:55 1 requests served by plaintiffs on the PA. And I was  
11:28:03 2 asking him about the interrogatories served on the PA.

11:28:11 3 MR. O'TOOLE: And with all respect, I agreed,  
11:28:15 4 although your question, I believe, also asked him to  
11:28:20 5 discuss searches conducted by the PLO.

11:28:24 6 MR. SCHOEN: Yes. That's part of the -- oh,  
11:28:25 7 searches conducted by the PLO. No, my question is --  
11:28:27 8 I'll clarify that. I thought this was my question.

11:28:33 9 Q. BY MR. SCHOEN: My question was what, if any,  
11:28:35 10 steps you took to determine -- to determine any and all  
11:28:45 11 searches conducted by the PA on this question, on the  
11:28:57 12 question I'll ask you: A search for information as to  
11:29:14 13 what, if any, money -- what, if any, money was paid to  
11:29:32 14 the PFLP by either the PA or the PLO between the dates  
11:29:51 15 February 16, 1998, and February 16, 2002.

11:30:03 16 THE WITNESS: Should I answer?

11:30:03 17 MR. O'TOOLE: Yes.

11:30:06 18 THE WITNESS: As I mentioned earlier, I  
11:30:13 19 conducted a telephone conversation with Mrs. Fadia  
11:30:17 20 Shayeb to ask her about the contract of the PFLP. And  
11:30:34 21 on the margin of this call or through this call, she  
11:30:42 22 informed me that they received an official request from  
11:30:48 23 the attorneys of the PA to search for any payments that  
11:30:59 24 were made to the PFLP during the aforementioned period.  
11:31:07 25 And they did not find, except for this single payment,



11:31:11 1 in the name of the PFLP.

11:31:14 2 And she informed me further that she has been  
11:31:21 3 searching for a period which is much larger in chunk  
11:31:28 4 than what was requested.

11:31:29 5 Q. BY MR. SCHOEN: And when you say "this single  
11:31:32 6 payment," as it was translated, you're referring to the  
11:31:40 7 rental for the PFLP office that we spoke about earlier,  
11:31:51 8 in Kalkilya?

11:31:52 9 A. This is correct. But this does not mean it  
11:32:02 10 is a single payment for other offices that could be  
11:32:06 11 other towns, such as Ramallah and Jenin and what have  
11:32:12 12 you. Because the payments come in the name of the  
11:32:17 13 person that rents, so in the computer it appears in  
11:32:25 14 the name of the person who rents.

11:32:31 15 Q. Okay. So if I understand you -- correct me  
11:32:34 16 if I'm wrong -- a person could be a member of the PFLP,  
11:32:50 17 renting an office for the PFLP, and the PA might pay the  
11:32:58 18 rent for that office. But she, in her search -- this  
11:33:08 19 is the --

11:33:08 20 OFFICIAL INTERPRETER AGHAZARIAN: Fadia.

11:33:09 21 Q. BY MR. SCHOEN: Fadia, in her search, might  
11:33:15 22 not have been able to find that as a payment to the  
11:33:20 23 PFLP simply because the record would show it -- the  
11:33:30 24 record she had would be in his name, not in the name  
11:33:38 25 of the PFLP?

11:33:47 1 A. The owner, who is not necessarily a member  
11:33:50 2 of the PFLP or affiliated to it.

11:33:53 3 Q. But still, it could be rented for use as a  
11:33:57 4 PFLP office. She just couldn't identify it as that from  
11:34:09 5 her search, because the payment recorded in her records,  
11:34:20 6 that she had access to, just had the landlord's name  
11:34:28 7 that the payment was made to by the PA; is that correct?

11:34:36 8 A. Yes, possible.

11:34:40 9 Q. If such a payment is made by the PA to the  
11:34:48 10 landlord, is there a line in the budget where that would  
11:34:57 11 be reflected, that kind of payment?

11:35:13 12 A. No.

11:35:19 13 Q. Is there any way to determine from the budget  
11:35:28 14 how much money is paid to any faction?

11:35:41 15 A. Not through the budget. But if there are such  
11:35:48 16 payments, it could be in the final estimate, after the  
11:35:57 17 money is -- after the -- it's implemented.

11:36:05 18 Q. I don't understand.

11:36:18 19 A. There is no item in the budget for amounts  
11:36:22 20 earmarked for the factions.

11:36:27 21 Q. Okay. So looking at the year past, let's say  
11:36:31 22 in the year 2002, you wanted to determine how much money  
11:36:46 23 was paid to any faction of the PLO in the previous year.

11:36:58 24 Would there be a way for you to tell that, to  
11:37:01 25 determine that?

11:37:08 1 When I say "you," I mean the PA.

11:37:15 2 A. I said yes, the PA. In the annual budget law,  
11:37:33 3 there are items for expenditure. We call it centers of  
11:37:39 4 responsibility.

11:37:45 5 For instance, the Land Authority, it has  
11:37:47 6 a mandate, and it has a budget; the same, Ministry of  
11:37:53 7 Health, Ministry of Education, what have you. If we  
11:38:02 8 look at this annual budget laws, we don't have an item  
11:38:13 9 that refers to the PLO factions as factions.

11:38:18 10 What used to be paid, if it has been paid,  
11:38:30 11 was usually by decisions from President Arafat, which  
11:38:40 12 are clearly irregular kinds of payments. And maybe  
11:38:52 13 four applications are presented, maybe one or none  
11:38:55 14 will be approved. Not every request from his part  
11:39:03 15 was necessarily paid.

11:39:06 16 Q. Let me ask you a specific question: Do you  
11:39:10 17 know Mr. Malouh? Do you know who that is?

11:39:15 18 A. Yes.

11:39:15 19 Q. He -- do you know he is the PFLP  
11:39:22 20 representative on the PLO?

11:39:24 21 A. (Translated.) Yes.

11:39:25 22 (In English.) Yes, yes, I know.

11:39:25 23 Q. Okay. I represent to you that Mr. Malouh  
11:39:29 24 testified that the PA pays for his car and a driver  
11:39:38 25 for his car.

11:39:41 1 A. That's --

11:39:41 2 MR. O'TOOLE: I'm going to --

11:39:41 3 MR. SCHOEN: I misspoke?

11:39:50 4 MR. O'TOOLE: I'm going to object.

11:39:50 5 MR. SCHOEN: Yeah.

11:39:51 6 MR. O'TOOLE: Because I'm not sure that the --

11:39:52 7 I haven't read the transcript of the Malouh deposition.

11:39:58 8 But I'm not sure that it's clear whether the PLO is

11:40:02 9 paying for his car and his driver or the PA.

11:40:09 10 Q. BY MR. SCHOEN: Okay. Do you know whether the

11:40:13 11 PA pays for Mr. Malouh's car and driver?

11:40:18 12 A. I'm not surprised at all that they pay,

11:40:22 13 because he is a member of the Executive Committee of

11:40:25 14 the PLO.

11:40:27 15 Q. Of course. Okay. So assume that the PA

11:40:29 16 pays for Mr. Malouh's car and driver --

11:40:40 17 MR. O'TOOLE: I'm going to object to the

11:40:42 18 extent that that purports to reflect his past testimony.

11:40:46 19 Because he used the word "they," so it's not clear who

11:40:52 20 he's saying paid for the car and driver.

11:40:57 21 Q. BY MR. SCHOEN: Okay. Assuming the PA pays

11:41:00 22 for Mr. Malouh's car and driver and for Mr. Malouh's

11:41:05 23 home, if that were to occur, is there a place in the

11:41:17 24 budget where that kind of payment would be reflected?

11:41:31 25 A. If this is the case, such payments are paid

11:41:39 1 to Malouh and others in their capacity as members of the  
11:41:48 2 Executive Committee of the PLO, and the person in charge  
11:41:57 3 of the budget and funds of the PLO, and it comes under  
11:42:08 4 the item of the Palestinian National Fund.

11:42:13 5 Q. There is just a general item for the  
11:42:14 6 Palestinian National Fund?

11:42:21 7 A. I think yes.

11:42:26 8 Q. Okay. Do you know whether -- you were the  
11:42:28 9 legal counsel for the Ministry of Finance for many  
11:42:32 10 years; right?

11:42:36 11 A. Yes.

11:42:37 12 Q. You are aware that each faction of the PLO  
11:42:48 13 has one or more representatives of that faction as a  
11:42:54 14 member of the PLO; correct?

11:43:03 15 A. In the Executive Committee of the PLO, yes.

11:43:07 16 Q. Each faction has a member on the Executive  
11:43:11 17 Committee of the PLO?

11:43:14 18 A. Yes.

11:43:14 19 Q. Okay. Do you know whether the PA pays for  
11:43:20 20 the expenses of the representative of the faction to  
11:43:26 21 the PLO?

11:43:30 22 A. Yes, as -- as members of the Executive  
11:43:44 23 Committee.

11:43:47 24 Q. What kinds of expenses of the representative  
11:43:51 25 of the faction, who is a member of the PLO Executive

11:43:53 1 Committee, does the PA pay?

11:44:09 2 A. I don't know exactly. But it does not exceed  
11:44:17 3 the personal expenses, such as a monthly allocation,  
11:44:23 4 salary.

11:44:26 5 Q. Aah, okay. So let's take salary.

11:44:31 6 A. Such as the car.

11:44:33 7 Q. Okay. So the PA pays the -- pays a salary  
11:44:36 8 to the PFLP faction member who sits on the Executive  
11:44:44 9 Committee, PLO Executive Committee?

11:44:59 10 A. Yes.

11:44:59 11 Q. Okay. And the PA pays for that same person --

11:45:06 12 A. Salary.

11:45:06 13 Q. What?

11:45:09 14 A. Salary. Okay.

11:45:10 15 Q. Salary. Do you know what the salary is, paid  
11:45:13 16 to the faction members?

11:45:15 17 A. No.

11:45:15 18 Q. Okay.

11:45:16 19 A. I don't know.

11:45:18 20 Q. The PA provides a car and driver at the PA's  
11:45:23 21 expense for this same faction representative?

11:45:36 22 A. I don't know.

11:45:37 23 Q. You don't know if it pays for a car and  
11:45:40 24 driver?

11:45:43 25 A. I don't know.

11:45:43 1 Q. Do you know who would know that?

11:45:50 2 A. The persons that are related to payments.

11:45:53 3 Q. Who are those persons? That's in the Ministry  
11:45:56 4 of Finance?

11:45:58 5 A. I don't know. They could be people from the  
11:46:06 6 National Fund, those who -- who execute the policies of  
11:46:12 7 the PLO.

11:46:18 8 CHECK INTERPRETER HAZOU: "Budget."

11:46:19 9 OFFICIAL INTERPRETER AGHAZARIAN: "Budget."

11:46:22 10 Q. BY MR. SCHOEN: So you, Nadime, don't know  
11:46:29 11 who, if anyone, is responsible for paying for the car  
11:46:36 12 of the faction member who sits on the PLO Executive  
11:46:40 13 Committee?

11:46:49 14 A. I said I don't know. But most probably the  
11:47:05 15 person who is in charge of the implementation of the  
11:47:08 16 budget of the PLO.

11:47:11 17 Q. Who is that person?

11:47:15 18 A. The Palestinian National Fund.

11:47:17 19 Q. Who runs the Palestinian National Fund?

11:47:22 20 A. Dr. Ramzi Khouri.

11:47:26 21 Q. And would your answer be the same if I were  
11:47:31 22 to ask you about whether the PA pays for the details  
11:47:39 23 of any payment for the home of a faction member who  
11:47:48 24 sits on the PLO Executive Committee?

11:48:03 25 A. My answer is -- my expectation or speculation,

11:48:11 1 if you like -- and it is emanated from measurement --  
11:48:18 2 I believe that there is an item in the budget where the  
11:48:28 3 center of responsibility is the PNF. And this fund is  
11:48:37 4 the one that is responsible to cover the PLO.

11:48:43 5 Q. Okay. So with respect to any search that was  
11:48:52 6 made to determine any and all money that was paid during  
11:49:00 7 the time frame I mentioned, '98 to 2002, money paid by  
11:49:11 8 the PA or PLO to the PFLP, is it your testimony that  
11:49:27 9 the entire search conducted by the PA consisted of your  
11:49:38 10 telephone call with Mrs. Fadia, what you understand to  
11:49:50 11 be the computer search she conducted, and your review  
11:49:56 12 of the contract for the rent of the PFLP office in  
11:49:59 13 Kalkilya?

11:50:02 14 Are you aware of any -- are you aware of any  
11:50:11 15 other steps that were taken to answer that question,  
11:50:20 16 the question of any monies that were paid to the PFLP  
11:50:33 17 by the PA or PLO during that period?

11:50:43 18 Are you aware of any other steps taken by  
11:50:45 19 the PA?

11:50:52 20 A. I don't know. The only thing I can say  
11:50:59 21 on this matter, what occurred in the telephone talk,  
11:51:11 22 conversation, with Fadia. I reiterate that she has  
11:51:23 23 conducted the search based on the request of the PA  
11:51:29 24 attorneys for the specific period which is requested  
11:51:36 25 from them, even for a period which is even longer than



11:51:40 1 the time span of this period.

11:51:45 2 Q. I understand. And any other steps taken that  
11:51:48 3 you're aware of?

11:51:52 4 A. I don't know.

11:52:15 5 Q. Do you know what, if any, steps were taken  
11:52:26 6 by the PA -- steps taken by the PA to determine whether  
11:52:35 7 any funds, any money, was paid by either the PA or the  
11:52:45 8 PLO during that same time period, '98 to 2002, to the  
11:53:00 9 Al-Hadaf Center for Studies and Media?

11:53:12 10 A. I don't know.

11:53:16 11 Q. For each of these requests, I'm referring to  
11:53:19 12 the same time period, '98 to 2002. Okay?

11:53:32 13 A. The period of the search.

11:53:34 14 Q. Yes. There's February 16, '98, to  
11:53:40 15 February 16, 2002.

11:53:45 16 A. Okay.

11:53:46 17 Q. Okay. Are you aware of any steps taken by  
11:53:49 18 the PA to search for any information regarding whether  
11:53:53 19 any money was paid by the PA or PLO to the Union of  
11:54:07 20 Palestinian Women's Committees?

11:54:27 21 Are you aware of any steps that were taken  
11:54:29 22 to determine that information?

11:54:41 23 A. The question, is it a search for getting  
11:54:46 24 information, how -- how that the PA has paid amounts  
11:54:52 25 during this given period?

11:54:55 1 Q. That's my question.

11:54:56 2 Do you know what steps were taken to determine  
11:54:58 3 whether the PA or PLO paid any money to the organization  
11:55:10 4 I mentioned?

11:55:20 5 A. I don't -- I don't know what kind of steps  
11:55:23 6 were taken.

11:55:24 7 MR. SCHOEN: Okay. We only have a couple of  
11:55:28 8 minutes left. Let me just do one thing before we break.

11:55:31 9 You have an exhibit marker? I'm going to mark  
11:55:35 10 this as Exhibit A to Nadime's deposition.

11:55:42 11 Q. BY MR. SCHOEN: This purports to be or -- it  
11:55:45 12 purports to be the contract for the rent of the Kalkilya  
11:55:50 13 PFLP office --

11:55:54 14 OFFICIAL INTERPRETER BEN-NAIM: Between the  
11:55:54 15 PA?

11:56:10 16 Q. BY MR. SCHOEN: -- for the rent of the  
11:56:10 17 Kalkilya PFLP office that I believe is the document  
11:56:12 18 you were referring to that you reviewed. But I want  
11:56:24 19 to show you the document and ask you if you can identify  
11:56:28 20 it.

11:56:33 21 A. (Examining.) This is what we were talking  
11:56:42 22 about. Yes.

11:56:50 23 MR. SCHOEN: Okay. Sure, yeah. I just want  
11:56:50 24 to mark it. Okay. Let's just take our break now, and  
11:56:54 25 we'll mark it.

11:56:54 1 MR. O'TOOLE: Great.

11:56:54 2 THE VIDEOGRAPHER: Going off the record

11:56:54 3 at 11:55 --

11:56:54 4 THE WITNESS: If this will be extended

11:56:54 5 until --

11:56:54 6 MR. SCHOEN: It's not on the record. It's not

11:56:54 7 on the record.

11:56:56 8 THE WITNESS: Until when?

11:57:01 9 MR. SCHOEN: Is it on the record?

11:57:01 10 THE WITNESS: Until when shall this go on?

11:57:03 11 MR. SCHOEN: What? The break? Oh, how long

11:57:06 12 will the deposition go on? I can't answer that. You

11:57:09 13 were designated for many subjects.

11:57:15 14 THE WITNESS: So let us continue.

11:57:18 15 MR. SCHOEN: Oh, sure, sure. Sure, sure.

11:57:21 16 THE WITNESS: We don't need to waste time with

11:57:24 17 breaks.

11:57:25 18 MR. SCHOEN: Yeah, he just needs to change the

11:57:27 19 tape. We don't need to take a break.

11:57:28 20 THE VIDEOGRAPHER: Going off the record at

11:57:30 21 11:56.

11:57:31 22 (N. Al-Barahme Exhibit A marked.)

11:57:31 23 (Recess from 11:56 a.m. to 12:11 p.m.)

12:12:38 24 THE VIDEOGRAPHER: Back on the record at

12:12:40 25 12:11.

12:12:43 1 Q. BY MR. SCHOEN: Nadime, let me show you what  
12:12:47 2 we've previously marked as Exhibit A to this deposition,  
12:12:52 3 which is marked Bates stamp 42 from the defendants'  
12:12:57 4 production, and ask you what -- to describe that  
12:13:08 5 document.

12:13:12 6 MR. O'TOOLE: For the record, I'm going to  
12:13:14 7 object, because we have been provided with --

12:13:16 8 OFFICIAL INTERPRETER BEN-NAIM: Sir, you need  
12:13:16 9 to raise your voice. I can't hear you. Sorry.

12:13:16 10 MR. O'TOOLE: -- a document in Arabic with  
12:13:18 11 no English translation.

12:13:20 12 MR. SCHOEN: Okay.

12:13:21 13 MR. O'TOOLE: To the extent that the --  
12:13:22 14 to the extent that plaintiffs later want to try and  
12:13:25 15 supplement this deposition with an English translation  
12:13:28 16 of this document, we will object.

12:13:32 17 MR. SCHOEN: I have provided the witness  
12:13:34 18 with a document Bates stamped 42 in the form in which  
12:13:46 19 the defendants produced it to the plaintiffs. No  
12:14:00 20 translations were provided by the defendants. And  
12:14:07 21 my understanding is that the witness does not speak  
12:14:12 22 or read English.

12:14:17 23 I intend to examine the witness about the  
12:14:27 24 document, which I understood he reviewed in preparation  
12:14:35 25 for this deposition.

12:14:42 1 MR. O'TOOLE: And just to supplement that,  
12:14:44 2 we have no objection to the witness reviewing an Arabic  
12:14:48 3 document, commenting on an Arabic document.

12:15:02 4 Our objection is purely about the record  
12:15:04 5 being made by this deposition. It will be closed at  
12:15:14 6 the end of the deposition, and there will be no English  
12:15:18 7 translations to supplement this, if this proceeding is  
12:15:21 8 ever put before a different -- before -- before -- a  
12:15:24 9 fact finder or before a judge.

12:15:27 10 MR. SCHOEN: I will want that fact finder  
12:15:29 11 to review the document that's been presented to the  
12:15:30 12 witness in Arabic, as it was produced to us. And  
12:15:33 13 if at some point in the future, for some purpose,  
12:15:35 14 a translation is provided, the court will rule on  
12:15:39 15 whether that's appropriate or not.

12:15:44 16 OFFICIAL INTERPRETER BEN-NAIM: I am  
12:15:45 17 summarizing it.

12:15:51 18 (Colloquy translated.)

12:15:56 19 Q. BY MR. SCHOEN: Nadime, is -- Exhibit A is the  
12:16:28 20 contract that you reviewed?

12:16:35 21 A. (Examining.) Yes. Correct.

12:16:37 22 Q. Okay. Do you remember where you got a copy of  
12:16:40 23 that document in order to review it?

12:16:55 24 A. In my meeting with the defense attorneys.

12:16:59 25 Q. Is that the first time you recall seeing that

12:17:01 1 contract?

12:17:12 2 A. Definitely not, because I have a signature  
12:17:15 3 there on the 2nd of August, 2001.

12:17:19 4 Q. You signed that contract on the 2nd?

12:17:23 5 A. (Witness nods head in the affirmative.)

12:17:26 6 Q. And in fact, in 2001, in August, you reviewed  
12:17:39 7 a legal opinion about this contract; correct?

12:17:47 8 A. Yes.

12:17:49 9 MR. SCHOEN: So that you guys are aware, this  
12:17:51 10 is a document that's referred to in a privilege log --

12:17:55 11 MR. O'TOOLE: Right.

12:17:56 12 MR. SCHOEN: -- that you provided. I'm going  
12:17:58 13 to ask him -- well, you'll see what I ask him. You can  
12:18:02 14 object when appropriate.

12:18:02 15 MR. O'TOOLE: Okay.

12:18:02 16 MR. SCHOEN: If appropriate.

12:18:02 17 Q. BY MR. SCHOEN: Who is Mahmoud Al-Shaer, if  
12:18:10 18 you know?

12:18:12 19 A. He is a lawyer in the legal department that  
12:18:15 20 I was heading.

12:18:16 21 Q. All right. And he provided you with a  
12:18:18 22 document described as a legal opinion?

12:18:30 23 A. Yes. Supposed to be, yes.

12:18:35 24 Q. Regarding the review of a contract -- sorry --  
12:18:38 25 regarding the review of a request for the payment of

12:18:46 1 rent for the Kalkilya office of the Popular Front for  
12:18:59 2 the Liberation of Palestine, PFLP?

12:19:04 3 (Pending question partially translated.)

12:19:06 4 CHECK INTERPRETER HAZOU: I'm sorry, but he  
12:19:07 5 said "office," not "offices."

12:19:09 6 (Remainder of pending question translated.)

12:19:10 7 THE WITNESS: Yes, but what is the legal  
12:19:22 8 opinion? On what basis it provides like a legal  
12:19:31 9 position or opinion?

12:19:33 10 MR. O'TOOLE: At this point, I'm going to  
12:19:35 11 object and instruct the witness not to answer further  
12:19:39 12 questions about this document. We have produced a  
12:19:50 13 privilege log which has listed this document --

12:20:01 14 OFFICIAL INTERPRETER BEN-NAIM: What did you  
12:20:03 15 submit? I'm sorry.

12:20:05 16 MR. O'TOOLE: We have submitted a privilege  
12:20:08 17 log which has identified this document but withheld it  
12:20:14 18 from production on the grounds of privilege.

12:20:27 19 I have allowed the witness to confirm the  
12:20:30 20 existence of this document. But any further attempt  
12:20:36 21 to determine its contents or to obtain the document  
12:20:45 22 must, under the Federal Rules of Civil Procedure, be  
12:21:00 23 conducted in the course of a motion to compel production  
12:21:03 24 of this document.

12:21:05 25 OFFICIAL INTERPRETER BEN-NAIM: Again? Sorry.

12:21:07 1 MR. O'TOOLE: Must be conducted in the course  
12:21:09 2 of a motion to compel production of this document.

12:21:17 3 OFFICIAL INTERPRETER BEN-NAIM: I didn't get  
12:21:19 4 that. Sorry.

12:21:21 5 MR. O'TOOLE: A motion to compel production of  
12:21:23 6 this document, if plaintiffs intend to dispute the claim  
12:21:33 7 of privilege.

12:21:34 8 OFFICIAL INTERPRETER BEN-NAIM: To dis -- to  
12:21:34 9 what to do?

12:21:34 10 MR. O'TOOLE: To dispute the claim of  
12:21:34 11 privilege.

12:21:34 12 (Brief exchange in Arabic between Official  
12:21:34 13 Interpreter Aghazarian and Official Interpreter  
12:21:34 14 Ben-Naim.)

12:21:34 15 (Colloquy translated.)

12:21:34 16 MR. O'TOOLE: So at this time, I'm instructing  
12:22:00 17 the witness not to answer further questions about the  
12:22:03 18 privileged document.

12:22:14 19 Q. BY MR. SCHOEN: I'd like to ask the witness  
12:22:16 20 whether he recalls -- and give your lawyer a chance  
12:22:25 21 to object after I ask you the question.

12:22:30 22 I'd like to ask the witness -- I'd like to  
12:22:32 23 ask the witness if he recalls if the document was a  
12:22:43 24 request for his legal opinion or a request that he  
12:22:53 25 review Mr. Al-Shaer's legal opinion?



12:23:05 1 MR. O'TOOLE: And we are going to object  
12:23:08 2 and instruct the witness not to answer.

12:23:10 3 Q. BY MR. SCHOEN: And I'd like to ask the  
12:23:12 4 witness whether he knows whether any other person  
12:23:15 5 reviewed the document we're talking about?

12:23:24 6 MR. O'TOOLE: I will allow the witness to  
12:23:26 7 answer that question.

12:23:33 8 THE WITNESS: What do you mean by "another  
12:23:35 9 person"? From the legal department or what?

12:23:38 10 Q. BY MR. SCHOEN: Any other person.

12:23:40 11 Do you know whether any other person  
12:23:43 12 reviewed -- any other person reviewed that document?

12:23:56 13 A. According to the procedures that take place  
12:24:00 14 within the ministry, the payment procedure, including  
12:24:13 15 paying for rent, the contract for rent, needs to be  
12:24:21 16 cleared from the internal monitoring department.

12:24:26 17 Q. Okay. And this contract was cleared?

12:24:33 18 A. For sure. Otherwise, payment will not go  
12:24:37 19 through.

12:24:45 20 Q. Okay. What's the procedure that you  
12:24:48 21 described? You said there's a procedure that a request  
12:24:50 22 for payment has to go through.

12:24:51 23 A. Any payment request must have a basis. Maybe  
12:25:11 24 there are different invoices or agreements, or sometimes  
12:25:20 25 a place of origin that needs to be clarified. All these

12:25:32 1 are like accounting backups.

12:25:39 2 Q. Okay. Would you please describe for me the  
12:25:42 3 document that's been marked Exhibit A.

12:25:46 4 A. Didn't he object?

12:25:58 5 MR. O'TOOLE: You may answer. Not about that  
12:25:59 6 document.

12:26:00 7 MR. SCHOEN: He didn't translate the question  
12:26:02 8 for me. What was the question?

12:26:03 9 OFFICIAL INTERPRETER AGHAZARIAN: "Didn't he  
12:26:03 10 say 'object' to that, not to answer?"

12:26:03 11 MR. SCHOEN: And the answer?

12:26:03 12 MR. O'TOOLE: And my answer is: He may answer  
12:26:12 13 questions about that document. I was referring to a  
12:26:15 14 different document that has been held.

12:26:15 15 (Colloquy partially translated.)

12:26:16 16 OFFICIAL INTERPRETER BEN-NAIM: "Questions"  
12:26:17 17 or "question"?

12:26:18 18 MR. O'TOOLE: "Questions."

12:26:20 19 (Remainder of colloquy translated.)

12:26:30 20 THE WITNESS: What do you want from me to --

12:26:33 21 Q. BY MR. SCHOEN: Describe what you see on that  
12:26:36 22 document. What is the document?

12:26:38 23 A. It is a document of a rent contract for  
12:26:48 24 real estate in Kalkilya which is established on the  
12:26:56 25 land patch number 10. Describing this real estate:

12:27:08 1 A building composed of two stories, with an external  
12:27:15 2 yard. The person who is renting it: Muhammad Mahmoud  
12:27:29 3 Zeid.

12:27:37 4 Q. Let me interrupt one second. I'm sorry.

12:27:39 5 So we're clear on the translation, when you  
12:27:42 6 say "the person renting it," you mean the landlord, the  
12:27:47 7 owner of the property?

12:27:54 8 A. Yes, the landlord. The landlord or the person  
12:28:00 9 who is the custodian. It could be -- it could be the  
12:28:03 10 original owner or someone who is entitled to rent this  
12:28:08 11 property.

12:28:10 12 Q. So Mr. Zeid was the one renting the property  
12:28:13 13 to whoever was going to rent it under the contract?

12:28:23 14 A. Yes, for sure. Supposed to be.

12:28:26 15 Q. Okay. Go ahead.

12:28:38 16 A. The person renting is the office of the PFLP,  
12:28:42 17 dash, general -- general headquarters. The amount of  
12:28:54 18 rent: 4,560 Jordanian dinars annually. This annual  
12:29:13 19 amount, the way it will be paid as rent, should be  
12:29:21 20 paid in the beginning of every year. The date for  
12:29:31 21 the rent --

12:29:39 22 OFFICIAL INTERPRETER BEN-NAIM: "Starting  
12:29:39 23 rent." "Starting rent." "Starting date."

12:29:40 24 OFFICIAL INTERPRETER AGHAZARIAN: "Starting  
12:29:40 25 date of the rent."

12:29:40 1 THE WITNESS: -- the 1st of June, the year  
12:29:45 2 2000. End of contract of rent, 30th of May, 2001.

12:30:01 3 Description of the property: That it is a  
12:30:04 4 new building. How it will be utilized, this property:  
12:30:15 5 A general office to the party, party of the PFLP.

12:30:25 6 Did you translate the word "party" underlined?

12:30:29 7 OFFICIAL INTERPRETER AGHAZARIAN: Yes.

12:30:29 8 Q. BY MR. SCHOEN: Okay.

12:30:29 9 A. There is an indication that this was rented  
12:30:40 10 without any furniture, except having a kitchen within  
12:30:47 11 it.

12:30:52 12 These are general conditions that apply  
12:30:55 13 on all rent contracts, emanating -- you know, it's  
12:31:02 14 a regular standard thing for the person who rents and  
12:31:06 15 both sides, and the landlord and the tenant.

12:31:11 16 Should we go over them --

12:31:13 17 Q. Sure.

12:31:14 18 A. -- the general conditions?

12:31:23 19 Q. I'm not sure we need to go over it. Give  
12:31:26 20 me an example.

12:31:33 21 A. The obligations of the person that rents,  
12:31:39 22 according to the law.

12:31:41 23 Q. Okay. We don't need to go over it.

12:31:46 24 A. The special conditions: Subscription for  
12:31:54 25 water and electricity, it is the renter that pays.

12:32:05 1 Garbage taxes and education taxes, for the education:  
12:32:11 2 It's also the rentee.

12:32:14 3 MR. SCHOEN: The rentee's responsibility?

12:32:17 4 OFFICIAL INTERPRETER AGHAZARIAN: Yes. He  
12:32:21 5 pays for it.

12:32:22 6 MR. SCHOEN: The tenant? The tenant is the --

12:32:24 7 OFFICIAL INTERPRETER AGHAZARIAN: The tenant.

12:32:26 8 OFFICIAL INTERPRETER BEN-NAIM: Correct.

12:32:27 9 THE WITNESS: The tenant is not concerned with  
12:32:38 10 the store which is below the staircase, as well as the  
12:32:43 11 roof, which means that this is outside the realm of the  
12:32:48 12 contract.

12:32:49 13 Q. BY MR. SCHOEN: He's not responsible for it?

12:32:52 14 A. No. They cannot use them, the store which is  
12:32:59 15 below the staircase and the roof.

12:33:02 16 Q. Okay.

12:33:05 17 A. Now you have two witnesses for the contract,  
12:33:08 18 and there is the tenant and the landlord.

12:33:13 19 Q. All right. So who is the --

12:33:15 20 A. The first witness is called Nidal Hamayel.

12:33:17 21 The other witness is Saber Dahud. The tenant is the  
12:33:35 22 office of the PFLP, Shaher Al-Rai -- Shaher Al-Rai --  
12:33:58 23 it's not clear the family name.

12:34:00 24 Q. Shaher Al-Rai?

12:34:02 25 A. Possible. It could be Al-Rai.

12:34:05 1 Q. What is he -- in what capacity did he sign?

12:34:16 2 A. The tenant, on behalf of the PFLP, Shaher  
12:34:24 3 signed.

12:34:28 4 Q. Now --

12:34:28 5 A. The person who is renting is Muhammad Mahmoud  
12:34:30 6 Muhammad Zeid.

12:34:39 7 Q. Do you know who either of these witnesses  
12:34:41 8 whose names you read are?

12:34:44 9 In other words, do you know who Mr. Dahud is?

12:34:51 10 A. No, I don't.

12:34:53 11 Q. Do you know who Mr. -- I'll get it wrong --  
12:34:59 12 Hamayel is?

12:35:00 13 OFFICIAL INTERPRETER AGHAZARIAN: "Hamayel."

12:35:01 14 THE WITNESS: No, no.

12:35:01 15 Q. BY MR. SCHOEN: Do you know who Shaher Al-Rai  
12:35:02 16 is?

12:35:08 17 A. No.

12:35:09 18 Q. Now, you said also, I believe, that your  
12:35:12 19 signature appears on the contract?

12:35:24 20 A. (Translated.) Yes, as a legal adviser, that  
12:35:30 21 the contract is meeting the legal requirements --

12:35:35 22 (In English.) "As a contract."

12:35:38 23 (Translated.) -- as a contract. It is  
12:35:40 24 kosher.

12:35:42 25 Q. The legal requirements of the PA?

12:35:59 1 A. According to the law.

12:36:03 2 Q. Okay. I mean the law under the PA, though,  
12:36:05 3 that's my question. What law?

12:36:07 4 A. Yes.

12:36:10 5 Q. Now, sir, are you aware that Mr. Zeid received  
12:36:20 6 certain tax exemptions and deductions from his income in  
12:36:37 7 connection with this transaction?

12:36:49 8 A. Please repeat the question, just so it can be  
12:36:53 9 clear.

12:36:53 10 Q. Sure. Are you aware that Mr. Zeid received  
12:37:02 11 certain tax benefits in connection with this rental  
12:37:07 12 of this office to the PFLP?

12:37:19 13 A. It's not possible I don't. [sic]

12:37:25 14 Q. It's not possible? You're sure about that?

12:37:29 15 A. This is an income -- a part of the income of  
12:37:32 16 Muhammad Zeid. And as such, he must pay income tax like  
12:37:39 17 any other.

12:37:40 18 Q. And you're not aware of any deduction from his  
12:37:45 19 income that he can take as a result of this transaction,  
12:37:50 20 that he took?

12:37:51 21 (Pending question partially translated.)

12:37:55 22 OFFICIAL INTERPRETER BEN-NAIM: This contract?

12:37:57 23 MR. SCHOEN: Yes.

12:37:57 24 (Remainder of pending question translated.)

12:37:57 25 THE WITNESS: Deductions? You are confusing

12:38:09 1 between two documents. For sure, no. It's impossible  
12:38:20 2 that -- you know, you have a very clear-cut income  
12:38:24 3 according to this contract, and not to pay an income  
12:38:29 4 tax based on this contract.

12:38:32 5 Q. BY MR. SCHOEN: So he paid an income tax, full  
12:38:35 6 income tax on this?

12:38:43 7 A. It's supposed to be.

12:38:46 8 Q. And what about property tax, any tax --  
12:38:48 9 property tax benefit on this property?

12:39:00 10 A. There are two kinds of taxes here. There is  
12:39:04 11 the property tax, and there is the income tax.

12:39:11 12 Q. Are you aware of any kind of tax benefit  
12:39:14 13 Mr. Zeid received, either property tax or income tax,  
12:39:19 14 with respect to this property and his income?

12:39:22 15 (Pending question partially translated.)

12:39:22 16 OFFICIAL INTERPRETER BEN-NAIM: "With  
12:39:35 17 respect"?

12:39:37 18 MR. SCHOEN: "With respect to property tax."

12:39:35 19 OFFICIAL INTERPRETER BEN-NAIM: "With  
12:39:35 20 respect to"?

12:39:36 21 MR. SCHOEN: "Income on this property."

12:39:43 22 (Remainder of pending question translated.)

12:39:49 23 THE WITNESS: I don't know.

12:39:49 24 Q. BY MR. SCHOEN: Okay. You understand one  
12:39:52 25 of the subjects you were designated for is the, among



12:40:06 1 other things, tax benefits related to this property as  
12:40:16 2 reflected in the documents that the defendants produced  
12:40:23 3 to us?

12:40:28 4 Are you aware of that?

12:40:29 5 A. Where is it? Give it to me.

12:40:34 6 Q. I'm asking you first if you're aware that  
12:40:34 7 that's --

12:40:34 8 A. Get the document. Let's see it.

12:40:38 9 Q. I'll show you the document in a second.

12:40:45 10 A. Give it to me so that I am able to respond.

12:40:49 11 Q. I'm first just asking you whether you are  
12:40:52 12 aware that that's one of the subjects of your testimony  
12:40:58 13 today?

12:41:05 14 A. That somebody has taken tax deductions?

12:41:09 15 Q. That there is a tax benefit in connection with  
12:41:13 16 this apartment.

12:41:14 17 A. No. I had no -- I wasn't knowing about this.

12:41:18 18 MR. SCHOEN: Okay. Let me show you what I'm  
12:41:23 19 going to mark as Exhibit B to your deposition. These  
12:41:34 20 are documents with the Bates stamp 38, 39, and 43. But  
12:42:07 21 I should say at this point that these three documents,  
12:42:13 22 which were produced by the defendants, appear to have  
12:42:19 23 been marked by the defendants "confidential." So I want  
12:42:32 24 to give the defendants notice of that, at least, in case  
12:42:44 25 the defendants want to request certain procedures for

12:42:48 1 maintaining their confidentiality.

12:42:53 2 MR. O'TOOLE: And I thank you for the notice.

12:42:58 3 I believe that the protective order signed by the court  
12:43:02 4 provides a procedure for dealing with these documents,  
12:43:13 5 and we will follow that procedure as we progress.

12:43:29 6 MR. SCHOEN: Just give me one second.

12:43:51 7 I'm including a fourth page, which was marked  
12:43:58 8 Bates stamp 35, but the Bates stamp is no longer clearly  
12:44:07 9 discern -- you can't read the Bates stamp on this  
12:44:16 10 document right now.

12:44:24 11 I'm going to show defense counsel what we  
12:44:27 12 believe to be Bates stamp 35 and ask defense counsel  
12:44:40 13 if you recognize that as Bates stamp 35.

12:45:10 14 MR. O'TOOLE: I'm going to object to the  
12:45:12 15 irregularity of this procedure. I'm not sure -- there  
12:45:14 16 is a procedure to ask defense counsel if they recognize  
12:45:29 17 a particular document.

12:45:39 18 I can say that, if counsel is representing  
12:45:42 19 to us that this was part of the defendants' regular  
12:45:47 20 production and the Bates stamp is number 35, I'm  
12:46:01 21 willing to accept that representation, subject to  
12:46:04 22 further confirmation after the deposition.

12:46:08 23 (Colloquy partially translated.)

12:46:16 24 OFFICIAL INTERPRETER BEN-NAIM: "Subject to"?

12:46:18 25 MR. O'TOOLE: "Further confirmation."

12:46:20 1 (Remainder of colloquy translated.)

12:46:23 2 MR. SCHOEN: And I will make that

12:46:25 3 representation to counsel. And I'll specifically

12:46:35 4 represent that it was received from defendants in

12:46:38 5 between documents 34 and 36.

12:46:41 6 (Colloquy partially translated.)

12:46:46 7 OFFICIAL INTERPRETER BEN-NAIM: Hold on, hold

12:46:46 8 on. I lost you.

12:46:50 9 MR. SCHOEN: I'll specifically represent --

12:46:53 10 OFFICIAL INTERPRETER BEN-NAIM: This document?

12:46:54 11 MR. SCHOEN: -- that it was received from

12:46:57 12 defendants between Bates stamped documents 34 and 36.

12:47:06 13 (Colloquy partially translated.)

12:47:15 14 OFFICIAL INTERPRETER BEN-NAIM: "34 and 36"?

12:47:17 15 MR. SCHOEN: Right.

12:47:19 16 (Remainder of colloquy translated.)

12:47:19 17 (N. Al-Barahme Exhibit B marked.)

12:47:19 18 Q. BY MR. SCHOEN: It is shown now to the

12:47:23 19 witness, this four-page document that we'll mark as

12:47:26 20 Exhibit B, please. And I'd ask the witness to review

12:47:50 21 the four pages. And when you're finished reviewing it,

12:47:59 22 let me know, please.

12:48:01 23 A. (Examining.)

12:48:03 24 MR. O'TOOLE: And at this point, I'm going to

12:48:08 25 impose a continuing objection to the failure to present

12:48:16 1 translations in English during the deposition itself.

12:48:31 2 In our view, the deposition itself is the time to make  
12:48:42 3 the record in English for review by any American court  
12:48:57 4 or fact finder.

12:49:11 5 Defendants will object to any attempt to  
12:49:17 6 supplement the record at a later date with English  
12:49:30 7 translations that were not a contemporaneous part --  
12:49:38 8 that were not given to counsel and the parties at the  
12:49:51 9 same time --

12:49:51 10 (Colloquy partially translated.)

12:49:51 11 OFFICIAL INTERPRETER BEN-NAIM: Were not given  
12:49:51 12 to whom?

12:50:13 13 MR. O'TOOLE: To counsel and the parties,  
12:50:13 14 during the deposition.

12:50:14 15 (Remainder of colloquy translated.)

12:50:15 16 MR. O'TOOLE: Thank you.

12:50:16 17 MR. SCHOEN: Again, my response is: I'm  
12:50:19 18 asking the witness to review the document in Arabic  
12:50:26 19 as it was produced to us. No translations were produced  
12:50:37 20 to us.

12:50:39 21 I want the witness to be able to review the  
12:50:42 22 document and fully understand the document in the form  
12:50:59 23 that he will understand best and in the form in which  
12:51:14 24 we believe the document was created and maintained.

12:51:31 25 And further, to the extent there -- defense

12:51:34 1 counsel is raising any issue about defense counsel's  
12:51:45 2 inability to read the document, I would note that  
12:52:02 3 present with defense counsel is their local attorney,  
12:52:07 4 Mr. Saadi. And the defendants produced the document  
12:52:27 5 to us --  
12:52:33 6 (Colloquy partially translated.)  
12:52:37 7 OFFICIAL INTERPRETER BEN-NAIM: "Documents"  
12:52:38 8 or "document"?  
12:52:39 9 MR. SCHOEN: "Documents."  
12:52:42 10 -- and had full access to it.  
12:52:45 11 (Remainder of colloquy translated.)  
12:52:50 12 MR. O'TOOLE: One final point.  
12:52:51 13 (Colloquy partially translated.)  
12:52:51 14 OFFICIAL INTERPRETER BEN-NAIM: "Final," you  
12:52:51 15 said?  
12:52:51 16 MR. O'TOOLE: Yes.  
12:52:51 17 (Remainder of colloquy translated.)  
12:52:59 18 MR. O'TOOLE: The problem here is not  
12:53:00 19 the inability of the defendants to obtain their own  
12:53:04 20 translation of the document. The problem is, without  
12:53:15 21 the plaintiffs' English translation of the document,  
12:53:32 22 the defendants are unable to know in English precisely  
12:53:44 23 what the plaintiffs are offering the document for and  
12:53:52 24 to confront the proffer of that evidence in English  
12:54:01 25 during the deposition itself.

12:54:02 1 That's it.

12:54:02 2 MR. SCHOEN: My final point, then, is: The  
12:54:16 3 plaintiffs expressly requested from defense counsel,  
12:54:20 4 in previous e-mail correspondence to Mr. McAleer, one  
12:54:53 5 of the defense lawyers, English translations of all of  
12:55:00 6 the Arabic documents they were producing to us. And  
12:55:11 7 defense counsel failed or refused to provide us with  
12:55:21 8 any English translations.

12:55:25 9 MR. O'TOOLE: That -- that, just to clarify,  
12:55:28 10 defendants believe there was nothing improper with the  
12:55:32 11 failure to provide translations. And the defendants'  
12:55:35 12 translations are beside my point. It's what the  
12:55:39 13 plaintiffs are offering this document -- we're not  
12:55:41 14 offering the document -- for, in English. And if they  
12:55:41 15 want to offer it in English, they need to do it during  
12:55:51 16 the deposition properly.

12:55:56 17 Q. BY MR. SCHOEN: Nadime, have you had a chance  
12:56:00 18 to review Exhibit B?

12:56:03 19 (Comment in Arabic by the witness.)

12:56:03 20 OFFICIAL INTERPRETER AGHAZARIAN: "No."

12:56:03 21 (Brief exchange in Arabic between Official  
12:56:03 22 Interpreter Aghazarian and the witness.)

12:56:03 23 OFFICIAL INTERPRETER AGHAZARIAN: Sorry.

12:56:03 24 "Yes."

12:56:09 25 THE WITNESS: Yes.

12:56:11 1 Q. BY MR. SCHOEN: All four pages?

12:56:23 2 A. Yes.

12:56:24 3 Q. All right. Would you describe the document

12:56:26 4 for me and tell me which page you're describing?

12:56:34 5 A. Where is the number of the page?

12:56:39 6 Q. Except for 35, which you can't read, the

12:56:50 7 number is on the bottom of the page.

12:56:53 8 MR. SCHOEN: If I may show the witness?

12:56:56 9 Q. BY MR. SCHOEN: (Indicating.) Just the last

12:57:04 10 two numbers you can read, like 43, 39.

12:57:25 11 A. 43.

12:57:26 12 Q. Describe 43, then, please.

12:57:29 13 What is that document?

12:57:34 14 A. This is a document which is a photocopy of

12:57:39 15 a registry.

12:57:43 16 Q. Registry?

12:57:44 17 A. Registry output, issued by the Ministry of

12:57:51 18 Finance, the department of property taxes.

12:57:55 19 Q. Would it be fair to say that 43 shows that

12:58:02 20 Zeid is the legal and only owner of the structure?

12:58:06 21 (Pending question partially translated.)

12:58:06 22 OFFICIAL INTERPRETER BEN-NAIM: "The owner"?

12:58:18 23 MR. SCHOEN: "Legal owner of the structure."

12:58:22 24 OFFICIAL INTERPRETER BEN-NAIM: "Of the

12:58:24 25 construction"?

12:58:25 1 MR. SCHOEN: "Structure." "The property."  
12:58:26 2 (Remainder of pending question translated.)  
12:58:28 3 THE WITNESS: That's true. Yes.  
12:58:30 4 Q. BY MR. SCHOEN: If you would turn to 35, which  
12:58:33 5 is the one you can't read the number on it.  
12:58:40 6 A. I don't see it. Where is it?  
12:58:42 7 Q. May I show you?  
12:58:56 8 This is 35 on top. (Indicating.) Below that  
12:59:02 9 is 38 and 39. So if you would, please look at the page  
12:59:06 10 Bates stamped 35.  
12:59:14 11 (Pending question partially translated.)  
12:59:14 12 OFFICIAL INTERPRETER BEN-NAIM: "35"?  
12:59:14 13 MR. SCHOEN: "35."  
12:59:14 14 OFFICIAL INTERPRETER BEN-NAIM: Okay.  
12:59:14 15 (Remainder of pending question translated.)  
12:59:15 16 Q. BY MR. SCHOEN: What does that document  
12:59:17 17 indicate to you?  
12:59:22 18 A. This is a payment order where all the  
12:59:38 19 information regarding the payment that needs to be  
12:59:43 20 carried out. And it indicates the amount and how the  
12:59:50 21 payment will proceed, whether it is by bank transfer  
12:59:53 22 or through a check. And if it is a check, who received  
12:59:59 23 it, together with the signature of the receiving, and  
13:00:05 24 who prepared this payment order, and the reason for the  
13:00:15 25 payment.



13:00:18 1 Q. And do you see anywhere on that document -- do  
13:00:30 2 you see anywhere on there that an exemption or deduction  
13:00:35 3 from tax is provided for?

13:00:41 4 A. Maybe you are speaking -- you're speaking  
13:00:43 5 about a different --

13:00:45 6 Q. Well, I'm going to ask you to look at 35, 38,  
13:00:50 7 and 39 in conjunction.

13:00:59 8 A. 39, 35, and 38?

13:01:03 9 Q. 35, 38 and 39.

13:01:06 10 A. Good.

13:01:07 11 Q. Looking at those documents, together or  
13:01:09 12 separately, do you see any indication that Mr. Zeid  
13:01:21 13 was entitled to some kind of exemption from property  
13:01:33 14 tax and a deduction for -- with respect to the tax to  
13:01:43 15 be paid upon the income he received for the rental of  
13:01:55 16 that property?

13:02:02 17 A. Shall I answer?

13:02:04 18 Q. Yes, please.

13:02:06 19 A. Definitely not. This document indicates  
13:02:10 20 exactly the contrary. This confirms that all his income  
13:02:18 21 tax has been paid. The proof, that it says clearly that  
13:02:28 22 there is zero deduction.

13:02:31 23 Q. Let me ask you, on document 39 --

13:02:40 24 A. Is it this one? (Indicating.)

13:02:42 25 Q. 39 looks like this, and it says "39" at the

13:02:47 1 bottom.

13:02:50 2 A. Yes. This is what we're talking about.

13:02:53 3 Q. Yes. Who is the name that appears on the top,  
13:02:58 4 the top handwritten line?

13:03:09 5 A. You mean the title?

13:03:11 6 Q. Do you see the number, "47284"?

13:03:17 7 A. Yes, I do.

13:03:18 8 Q. And then there is a printed line below that;  
13:03:22 9 not handwritten, printed.

13:03:25 10 A. Okay.

13:03:26 11 Q. And then there is a line where something is  
13:03:32 12 written in. In the middle.

13:03:34 13 What does that say?

13:03:36 14 A. You want me to read this?

13:03:38 15 Q. Yes. What does that say?

13:03:40 16 A. (Reading through the interpreter.)

13:03:40 17 "The Popular Front for the Liberation of  
13:03:47 18 Palestine."

13:03:48 19 Q. Why is that appearing on this document, do  
13:03:51 20 you know?

13:04:02 21 A. Because the party that is in contract  
13:04:05 22 with the PFLP -- the beneficiary from the payment,  
13:04:14 23 it is supposed -- if he hasn't paid for the income  
13:04:19 24 tax or even before releasing the payment to him, any  
13:04:26 25 beneficiary benefiting from any sort of payment must

13:04:32 1 bring a certificate of deduction from income tax from  
13:04:39 2 the origin, from the source.

13:04:43 3 CHECK INTERPRETER HAZOU: Exactly, we call  
13:04:44 4 it tax deduction and source, a tax and source.

13:04:54 5 THE WITNESS: If the beneficiary has to pay  
13:04:58 6 taxes, the income tax orders the party that is paying  
13:05:13 7 to deduct a certain percentage from the total amount.  
13:05:19 8 And this is transferred to his account in the income  
13:05:24 9 tax.

13:05:27 10 This certificate in front of me indicates  
13:05:32 11 that the deduction is zero. This means that Muhammad  
13:05:40 12 Zeid, no tax is required from him, everything is  
13:05:50 13 settled. So he has paid all the taxes that he has  
13:05:54 14 to pay.

13:05:57 15 Therefore, the full amount is the same  
13:06:03 16 amount of the rent -- the same amount which is in  
13:06:10 17 the rent contract is the amount that has been paid  
13:06:19 18 to him without any income from the income tax.

13:06:23 19 Q. BY MR. SCHOEN: Is it your testimony, sir,  
13:06:25 20 that Mr. Zeid receives no tax benefit by virtue of  
13:06:37 21 renting his property to the PFLP?

13:06:46 22 A. You want me to witness -- I haven't opened  
13:06:54 23 the account. I am witnessing with an official document  
13:06:58 24 in front of me for a payment order. This official --  
13:07:06 25 this official document that is issued from an official

13:07:12 1 party confirms that Mr. Muhammad Zeid, that there are  
13:07:18 2 no amounts due on him, any amount is requested for --  
13:07:26 3 any account for this rental accord, contract. This  
13:07:32 4 means that he has no dues to the income tax and all  
13:07:38 5 his accounts with the income tax are closed.

13:07:42 6 Q. And you understand that to mean that he has  
13:07:48 7 paid full income tax on his income?

13:07:50 8 (Pending question partially translated.)

13:07:50 9 OFFICIAL INTERPRETER BEN-NAIM: "He has paid"?  
13:07:53 10 Sorry.

13:07:59 11 (Brief exchange in Arabic among Official  
13:07:59 12 Interpreter Aghazarian, Official Interpreter  
13:07:59 13 Ben-Naim, and Check Interpreter Hazou.)

13:08:04 14 THE WITNESS: According to my understanding  
13:08:06 15 to this document, until the date that it has been  
13:08:11 16 issued, he is supposed to have paid all what is  
13:08:19 17 requested from him.

13:08:20 18 Q. BY MR. SCHOEN: And does that document  
13:08:22 19 indicate to you that he actually paid -- that Mr. Zeid  
13:08:25 20 actually paid taxes?

13:08:39 21 A. According to my knowledge about the  
13:08:42 22 procedures, if he had not paid all the taxes requested  
13:08:49 23 from him, we assume that the income tax department,  
13:09:00 24 not to issue the document in the way that it has been  
13:09:05 25 issued. If there were any taxes requested from him,

13:09:14 1 they should have specified the ratio of deduction from  
13:09:18 2 the total amount. And since the ratio here is zero,  
13:09:30 3 this means that there are no requirements on him from  
13:09:32 4 the income tax.

13:09:32 5 Q. With respect to property tax, if Mr. Zeid owed  
13:09:45 6 zero in property tax, he had a complete exemption -- let  
13:09:59 7 me back up.

13:10:04 8 What does the property tax document show to  
13:10:07 9 you about his property taxes? What number is that?

13:10:13 10 A. The property tax, this is a certificate  
13:10:24 11 that he's clear, that he has settled everything, no  
13:10:29 12 requirement from him.

13:10:30 13 Q. Which Bates stamp number?

13:10:35 14 A. 38, is it? Up -- the one from the right,  
13:10:45 15 below?

13:10:50 16 Q. 38.

13:10:57 17 A. This indicates that Mr. Muhammad Zeid has  
13:11:05 18 reached a settlement with the property tax department  
13:11:12 19 and that he is clear. No money is requested from  
13:11:17 20 him from the property tax department until the 31st  
13:11:21 21 of December, 2001. And this is issued on the 26th  
13:11:30 22 [sic] of June, 2001. Sorry, hold on. Hold it.

13:11:32 23 (Brief exchange in Arabic among Official  
13:11:32 24 Interpreter Aghazarian, Official Interpreter  
13:11:32 25 Ben-Naim, and Check Interpreter Hazou.)

13:11:32 1 THE WITNESS: 16th of January.

13:11:45 2 Q. BY MR. SCHOEN: Does it show how much money  
13:11:46 3 Mr. Zeid paid in property tax?

13:11:50 4 A. It doesn't show. But there is here an  
13:12:01 5 indication that payment was done, because here there  
13:12:05 6 is a sort of payment receipt.

13:12:09 7 Q. What does the payment receipt say?

13:12:13 8 A. There is a number for the payment receipt.

13:12:19 9 Q. Yes. Is there an amount of money that was  
13:12:22 10 received? No?

13:12:23 11 A. No. Any landlord is requested to pay  
13:12:44 12 property tax, each landlord. They go to the department  
13:12:53 13 of the property tax, and they pay all what is due in  
13:12:58 14 taxes on him. And they take this as a unified form  
13:13:09 15 which is valid until a certain period, as is clear  
13:13:13 16 in the document. It is a certificate that, you know,  
13:13:22 17 there are no -- that he paid everything due on him.

13:13:24 18 Q. Everything due on him.

13:13:27 19 And you don't know what the amount was that  
13:13:30 20 was due?

13:13:32 21 A. No.

13:13:34 22 MR. SCHOEN: Okay.

13:13:36 23 THE VIDEOGRAPHER: Going off the record at  
13:13:38 24 1:12.

13:35:57 25 (Recess from 1:12 p.m. to 1:34 p.m.)

1 THE VIDEOGRAPHER: Going back on the record  
2 at 1:34.

3 Q. BY MR. SCHOEN: Nadime, let me show you, if  
4 I may, what I'm going to mark as Plaintiffs' Exhibit C  
5 for purposes of this deposition, which bears the Bates  
6 stamp number 41 from the defendants' production.

7 I'm going to ask you if you recognize that  
8 document.

9 A. (Examining.)

10 MR. SCHOEN: We have a copy for counsel. It's  
11 a one-page document.

12 MR. O'TOOLE: Continuing objection.

13 (Court reporter clarification.)

14 MR. O'TOOLE: Continuing objection.

15 MR. SCHOEN: Same response to that continuing  
16 objection; continuing response.

17 Q. BY MR. SCHOEN: Have you had a chance to  
18 review it?

19 A. Yes.

20 Q. If you would, sir, describe for me what is  
21 written on that document.

22 A. This is a letter addressed from Mr. Taysir  
23 Qubba'a, deputy chairman of the PNC, to His Excellency  
24 Yasser Arafat, president, on the 30th -- the month is  
25 not clear -- requesting the release of 4,000 Jordanian

13:38:22 1 dinars --

13:38:23 2 Q. Let me just interrupt one second.

13:38:27 3 Can you read the year on there?

13:38:38 4 A. Frankly, I'm not sure. Can you --

13:38:41 5 Q. Does it look like 2000 to you, sir?

13:38:49 6 A. Is this 2000 or what? For sure, I can't see.

13:38:59 7 Q. Mr. Saadi says 2000. But look at -- so just  
13:39:14 8 so we don't mix up --

13:39:20 9 A. I believe it's 2000.

13:39:22 10 Q. Okay. Let's go back to the document I gave  
13:39:26 11 you, just so the record is clear on the document.

13:39:33 12 Now, please continue. What else does the  
13:39:39 13 document say? It's a request from --

13:39:51 14 A. As I mentioned, he is requesting the release  
13:39:57 15 of an amount, 4,000 Jordanian dinars, for the branch  
13:40:06 16 of the Popular Front in Kalkilya. He is requesting  
13:40:17 17 this amount as an assistance due to the financial  
13:40:25 18 straits, dire need that the PFLP is passing through  
13:40:32 19 and that you are all familiar with.

13:40:36 20 MR. SCHOEN: That what?

13:40:39 21 OFFICIAL INTERPRETER AGHAZARIAN: "That you  
13:40:40 22 are familiar with."

13:40:40 23 THE WITNESS: Which means that the financial  
13:40:44 24 situation is tough.

13:40:45 25 Q. BY MR. SCHOEN: Taysir Qubba'a is telling



13:40:51 1 President Arafat that?

13:40:56 2 A. Yes.

13:41:02 3 Q. Okay. Anything else on the document?

13:41:05 4 A. For me, a signature of President Arafat  
13:41:15 5 is clear and lucid. And the date, which is attached  
13:41:23 6 to the signature is also clear, which is the 4th of  
13:41:28 7 October, 2001. But the explanation of President  
13:41:39 8 Arafat --

13:41:46 9 Q. You mean the explanation --

13:41:48 10 OFFICIAL INTERPRETER AGHAZARIAN: The  
13:41:48 11 "comment."

13:41:49 12 Q. BY MR. SCHOEN: -- in President Arafat's  
13:41:52 13 handwriting?

13:41:52 14 A. (In English.) Handwriting, yes.

13:41:55 15 (Translated.) Handwriting, yes.

13:41:56 16 Q. That's not so clear?

13:42:00 17 A. It is not clear. But from my experience  
13:42:05 18 from the days of the Ministry of Finance, it clearly  
13:42:12 19 has written Ministry of Finance-Ramallah. I assume  
13:42:27 20 that it is, you know: Go ahead and pay.

13:42:32 21 Q. Okay. And the signature is clear? It's  
13:42:35 22 President Arafat's signature?

13:42:37 23 A. Yes. That's clear.

13:42:37 24 MR. SCHOEN: Mark that Exhibit C, please. And  
13:42:37 25 let me show you what that --

13:42:37 1 (N. Al-Barahme Exhibit C marked.)

13:43:09 2 Q. BY MR. SCHOEN: Okay. By the way, do you  
13:43:12 3 recall who Taysir Qubba'a was?

13:43:14 4 A. (Examining.) It's written here. The deputy  
13:43:22 5 chairman of the PNC, National Council.

13:43:24 6 Q. And you're -- and you're aware also that  
13:43:26 7 Taysir Qubba'a was in the -- a member of the PFLP;  
13:43:31 8 right?

13:43:48 9 A. I don't know. I mean, I cannot confirm by  
13:43:51 10 passing through documents related to this.

13:43:56 11 Q. Taysir Qubba'a, though, is requesting the  
13:44:00 12 funds on behalf of the PFLP; right?

13:44:04 13 A. Maybe through his post, position, as a member  
13:44:18 14 of the PNC. And the PNC, as you know, incorporates all  
13:44:29 15 factions, including the PFLP.

13:44:34 16 Q. Okay. There were two comments in handwriting  
13:44:41 17 on the bottom of that page; correct?

13:44:43 18 (Pending question partially translated.)

13:44:43 19 OFFICIAL INTERPRETER BEN-NAIM: "Two  
13:44:43 20 comments"?

13:44:43 21 (Remainder of pending question translated.)

13:44:46 22 THE WITNESS: Yes.

13:44:46 23 Q. BY MR. SCHOEN: Are both of them unclear to  
13:44:48 24 you, or can you read either one of them?

13:45:00 25 A. No. The second comment is quite clear.

13:45:04 1 Q. What does that say?

13:45:06 2 A. This is the signature of -- from Dr. Atef  
13:45:12 3 Alawneh, who was the deputy minister of finance at  
13:45:16 4 that time. And he is in charge of -- of spend --  
13:45:22 5 of delivering payments. It is so that payment will  
13:45:31 6 proceed according to the standing bylaws.

13:45:39 7 Q. Payment of the requested rental money would  
13:45:42 8 proceed according to the bylaws of the PA?

13:46:02 9 A. According to the standard, the procedures that  
13:46:05 10 are in implementation.

13:46:07 11 Q. In the PA? Of the PA?

13:46:09 12 A. Yes.

13:46:15 13 Q. Okay. Now let me show you what I'm going to  
13:46:19 14 mark Plaintiffs' Exhibit D. It's Bates stamped 40 from  
13:46:31 15 the defendants' production, and I ask you to review it.

13:46:53 16 MR. O'TOOLE: Same objection.

13:46:55 17 MR. SCHOEN: Same response.

13:47:46 18 Q. BY MR. SCHOEN: Just tell me when you're  
13:47:48 19 finished.

13:47:49 20 A. Yes.

13:47:49 21 Q. Okay. Just one or two questions on this  
13:47:52 22 document.

13:47:54 23 Would you agree, sir, that this is a document  
13:47:58 24 dated the seventh month, sixth day, 2001? If you can  
13:48:19 25 read the date.

13:48:23 1 A. I can read the date.

13:48:28 2 Q. What's the date?

13:48:31 3 A. 6th of July, 2001.

13:48:33 4 Q. Okay. Would it be fair to characterize  
13:48:36 5 this document as a request by Taysir Qubba'a to Sami  
13:48:48 6 Al-Ramlawi, who was then the director general of the  
13:49:02 7 Ministry of Finance, asking him to continue the payment  
13:49:10 8 of rent on the PFLP building in Kalkilya that we're  
13:49:33 9 talking about?

13:49:38 10 Is that a fair characterization of that  
13:49:41 11 document?

13:49:44 12 A. No.

13:49:45 13 Q. Tell me what the document says.

13:49:52 14 A. This document is a letter which is dispatched  
13:49:56 15 from Taysir Qubba'a to Sami Ramlawi, telling him that,  
13:50:04 16 based on the approval of the president of the state of  
13:50:10 17 Palestine, that this decision -- that the president of  
13:50:20 18 the state decided the continuation of the payment of the  
13:50:27 19 rent fees of the PFLP, please implement this decision.

13:50:38 20 Q. Okay. Thank you. That's my question. I'm  
13:50:46 21 sorry if I --

13:50:46 22 A. As an indication, this is not addressed to  
13:50:54 23 Sami Ramlawi on the basis that he is entitled to make  
13:51:01 24 the payments.

13:51:03 25 MR. SCHOEN: Meaning -- I'm sorry, sorry.

13:51:06 1 Meaning Sami --

13:51:07 2 OFFICIAL INTERPRETER AGHAZARIAN: Sami

13:51:07 3 Ramlawi.

13:51:07 4 MR. SCHOEN: -- would be entitled to make  
13:51:07 5 the payments?

13:51:08 6 OFFICIAL INTERPRETER AGHAZARIAN: He has  
13:51:08 7 to implement.

13:51:08 8 THE WITNESS: He has to implement and not  
13:51:15 9 approve -- but he can also observe.

13:51:22 10 Q. BY MR. SCHOEN: Yeah, let me -- let me make  
13:51:23 11 it shorter, possibly. I'm not suggesting -- I'm not  
13:51:26 12 going back to the original conversation we had about  
13:51:30 13 whether Sami Ramlawi was entitled to order payment --

13:51:49 14 (Pending question partially translated.)

13:51:49 15 (Exchange in Arabic among Official Interpreter  
13:51:49 16 Ben-Naim, Check Interpreter Hazou, and the  
13:51:49 17 witness.)

13:51:49 18 (Remainder of pending question translated.)

13:51:50 19 Q. BY MR. SCHOEN: -- is entitled to authorize  
13:51:50 20 payment. I'm not asking about that.

13:51:57 21 If -- as you said, this is simply a request  
13:52:00 22 from Qubba'a, that Qubba'a wrote to Ramlawi, telling  
13:52:18 23 Ramlawi that President Arafat had approved this  
13:52:23 24 payment --

13:52:23 25 (Pending question partially translated.)

13:52:23 1 OFFICIAL INTERPRETER BEN-NAIM: Agreed on  
13:52:23 2 this payment?  
13:52:32 3 MR. SCHOEN: "Approved this payment."  
13:52:32 4 OFFICIAL INTERPRETER BEN-NAIM: Oh, okay.  
13:52:32 5 (Remainder of pending question translated.)  
13:52:36 6 Q. BY MR. SCHOEN: -- for the rent of the PFL  
13:52:38 7 building -- PFLP building in Kalkilya, and that the  
13:52:50 8 payment should continue as the president approved?  
13:53:06 9 A. It specifies that it's for the year 2001/2002.  
13:53:14 10 Q. Yes. Okay. Thank you. Finished with that  
13:53:16 11 document.  
13:53:16 12 MR. SCHOEN: Can you mark this D, please?  
13:54:07 13 (N. Al-Barahme Exhibit D marked.)  
13:54:09 14 OFFICIAL INTERPRETER BEN-NAIM: We have to  
13:54:09 15 change the name. It's Sami Ramlawi.  
13:54:12 16 MR. SCHOEN: S-a-m-i.  
13:54:12 17 OFFICIAL INTERPRETER BEN-NAIM: I was told  
13:54:12 18 different.  
13:54:12 19 MR. SCHOEN: Okay. If you just give me  
13:54:15 20 two minutes, I think I can cut through this area of  
13:54:15 21 questioning with one more question.  
13:54:31 22 You can tell him what I said.  
13:54:31 23 I just want to ask him one question on a  
13:54:34 24 subject that I think you had an objection on, but I'm  
13:54:37 25 just going to ask him the question. I don't think I

13:54:39 1 got an answer on it. I'll ask him.

13:54:40 2 MR. O'TOOLE: We'll see.

13:54:41 3 MR. SCHOEN: Yes.

13:54:41 4 Q. BY MR. SCHOEN: The document that I referred  
13:54:56 5 to earlier from Mr. Al-Shaer, which was described as a  
13:55:03 6 privileged document, do you know -- do you know who, if  
13:55:27 7 anyone else, saw that document between -- besides you  
13:55:32 8 and Mr. Al-Shaer?

13:55:41 9 MR. O'TOOLE: Again, as I did the last time,  
13:55:45 10 I will object to that question to the extent it seeks  
13:55:50 11 to reveal attorney/client privileged information about  
13:55:56 12 this document. But I will allow the witness to answer  
13:56:10 13 regarding who saw the document, to the extent he knows.

13:56:24 14 THE WITNESS: There are no documents in the  
13:56:26 15 Ministry of Finance that are privileged at this time.  
13:56:34 16 Every document passes through a number of parties. It  
13:56:40 17 has to pass for sure, by necessity, on the Treasury.  
13:56:46 18 It has to pass through the monitoring and the --

13:56:56 19 CHECK INTERPRETER HAZOU: "Audit control."

13:56:57 20 OFFICIAL INTERPRETER AGHAZARIAN: "Auditing."

13:56:58 21 THE WITNESS: It should pass through also to  
13:57:00 22 the attorney who is in charge of expenditure. If there  
13:57:05 23 is any need for legal review requirement, it has to pass  
13:57:11 24 through the legal advisor, the legal department. Then  
13:57:15 25 the public accounts after it is paid.

13:57:18 1 Q. BY MR. SCHOEN: What does that mean, "public  
13:57:21 2 accounts"?

13:57:29 3 A. General funds, accounts.

13:57:30 4 Q. Oh, I see.

13:57:30 5 A. General accounts. And this odyssey with any  
13:57:39 6 document, there are 50 to 60 functionaries that have a  
13:57:47 7 look at it. That's part of their job.

13:57:51 8 MR. SCHOEN: Okay. I have -- I'm going to try  
13:57:52 9 to --

13:57:53 10 MR. O'TOOLE: I'm going to object to the last  
13:57:55 11 question.

13:57:55 12 MR. SCHOEN: You objected to it.

13:57:56 13 MR. O'TOOLE: But it's not clear to me that  
13:57:58 14 when we refer -- referring to "that document," that the  
13:58:01 15 witness is distinguishing between the earlier documents  
13:58:05 16 that were put in front of him and the document you just  
13:58:07 17 had.

13:58:08 18 MR. SCHOEN: I described the document the  
13:58:10 19 same way I described it before. All right. In any  
13:58:20 20 event, I'm moving on to another subject.

13:58:23 21 I'm going to try to conflate -- there are  
13:58:26 22 three subject areas left in the designation: 1, 2,  
13:58:44 23 and 19. There's also 10. But I'm going to go to 19  
13:59:05 24 and try to conflate 1, 2, and 19.

13:59:27 25 Q. BY MR. SCHOEN: I'm going to ask him, though,



13:59:29 1 in the context of 19, which is going to take a while,  
13:59:42 2 again, I'm only asking you about what you know as the  
13:59:53 3 PA's representative here today regarding all efforts  
14:00:07 4 to search for answers to requests that the plaintiffs  
14:00:17 5 made to the defendants -- to search for answers to  
14:00:22 6 questions for information and documents we requested  
14:00:25 7 on the subjects that I'll ask you about.

14:00:45 8 A. I would like to -- I want to rectify what you  
14:00:50 9 have just said. I am not the representative of the PA.  
14:00:54 10 I am a witness for the defense counsel, summoned from  
14:00:57 11 the PA.

14:00:59 12 Q. Well, in this process, the PA was required  
14:01:11 13 to name a person to appear on their behalf, to answer  
14:01:22 14 questions in certain areas. And you were designated  
14:01:31 15 as that person for six different areas. That's why  
14:01:45 16 I'm asking you these questions.

14:01:51 17 A. Okay.

14:01:52 18 Q. What, if anything, do you know about the  
14:01:56 19 details of any search that was made to determine whether  
14:02:15 20 money -- I'm going to ask it in a little bit faster way,  
14:02:20 21 I think -- money -- I don't know how to translate the  
14:02:24 22 word -- safe houses, facilities -- okay.

14:02:48 23 Safe houses, facilities --

14:02:48 24 (Comment in Arabic by Mr. Haller.)

14:02:49 25 MR. HALLER: That's a "security house"?

14:02:51 1 OFFICIAL INTERPRETER AGHAZARIAN: No. "Safe  
14:02:51 2 house" is --  
14:02:52 3 (Comment in Arabic by Official Interpreter  
14:02:52 4 Aghazarian.)  
14:02:52 5 OFFICIAL INTERPRETER BEN-NAIM: No, "safe."  
14:02:52 6 "Safe" is also "secure" --  
14:02:52 7 MR. HALLER: Do you know what the meaning is?  
14:02:52 8 OFFICIAL INTERPRETER BEN-NAIM: I believe I  
14:02:52 9 do.  
14:02:52 10 CHECK INTERPRETER HAZOU: It's a translation.  
14:02:57 11 He's not sure what you mean by a "security house" in  
14:03:01 12 English.  
14:03:01 13 (Brief exchange in Hebrew and Arabic between  
14:03:01 14 Official Interpreter Ben-Naim and Mr. Haller.)  
14:03:01 15 OFFICIAL INTERPRETER AGHAZARIAN: Yes.  
14:03:03 16 OFFICIAL INTERPRETER BEN-NAIM: I cannot  
14:03:03 17 translate it --  
14:03:03 18 MR. HALLER: When that's the sense --  
14:03:05 19 (Brief exchange in Hebrew and Arabic between  
14:03:08 20 Official Interpreter Ben-Naim and Mr. Haller.)  
14:03:08 21 OFFICIAL INTERPRETER AGHAZARIAN: It was  
14:03:08 22 correct. Stick to it.  
14:03:08 23 THE COURT REPORTER: Gentlemen. Gentlemen,  
14:03:08 24 is this on the record? Please, gentlemen.  
14:03:08 25 MR. HALLER: Let Amy take it down.

14:03:28 1 OFFICIAL INTERPRETER BEN-NAIM: Just let me  
14:03:29 2 translate to what the witness said just to me: "You're  
14:03:31 3 right with your translation. We use this term in  
14:03:36 4 Palestinian or Arabic."

14:03:37 5 So I don't know. You decide.

14:03:42 6 MR. SCHOEN: Okay. In any event, I'll start  
14:03:44 7 over.

14:03:44 8 Q. BY MR. SCHOEN: Can you tell me the details  
14:03:55 9 of any search that you're aware of that was made by  
14:04:04 10 the PA or someone working for the PA to determine  
14:04:15 11 whether any -- to determine whether, between the years  
14:04:25 12 February 16th, 1998, and February 16, 2002, any money,  
14:04:47 13 any facilities, a home or office --

14:05:06 14 OFFICIAL INTERPRETER BEN-NAIM: The last word  
14:05:07 15 was? Any homes?

14:05:07 16 MR. SCHOEN: "Facilities."

14:05:07 17 OFFICIAL INTERPRETER BEN-NAIM: "Facilities"?  
14:05:07 18 Any homes or?

14:05:07 19 MR. SCHOEN: "Offices."

14:05:08 20 Q. BY MR. SCHOEN: -- offices or weapons, was  
14:05:12 21 given to any person at that time serving as a member  
14:05:18 22 of the PFLP --

14:05:24 23 (Brief exchange in Arabic between Official  
14:05:24 24 Interpreter Ben-Naim and Check Interpreter Hazou.)

14:05:35 25 OFFICIAL INTERPRETER BEN-NAIM: Okay.

14:05:35 1 Q. BY MR. SCHOEN: -- serving as a member of  
14:05:36 2 the PFLP?

14:05:39 3 That's the question. Do you know if any  
14:05:41 4 search was made to determine --

14:05:53 5 OFFICIAL INTERPRETER BEN-NAIM: "Whether"?

14:05:55 6 Q. BY MR. SCHOEN: -- to determine whether any  
14:05:56 7 of those things was paid, paid or given to any person,  
14:06:06 8 not just the organization, but any person who was at  
14:06:10 9 that time a member of the PFLP?

14:06:16 10 A. Concerning the first part, which is related  
14:06:29 11 to the PFLP, I have already answered this question.

14:06:32 12 Q. Yes.

14:06:32 13 A. Regarding this given period --

14:06:40 14 (Court reporter clarification.)

14:06:40 15 OFFICIAL INTERPRETER AGHAZARIAN: "Regarding  
14:06:40 16 this given period."

14:06:44 17 THE WITNESS: -- for any person who is a  
14:06:45 18 member of the PFLP, I don't know.

14:07:28 19 Q. BY MR. SCHOEN: Are you aware that the  
14:07:31 20 defendant -- the plaintiffs served on the defendants,  
14:07:40 21 gave to defense counsel, requests for certain documents  
14:07:47 22 to be produced in this case?

14:07:58 23 MR. O'TOOLE: I'm going to object to the  
14:08:00 24 extent the question suggests that the witness should  
14:08:03 25 have been aware of that. But to the extent he knows,

14:08:06 1 he may answer..

14:08:07 2 MR. SCHOEN: Okay. I'm not -- let me try and  
14:08:14 3 work through it, if we can. Maybe we can't. I suppose  
14:08:25 4 I certainly would imply that.

14:08:27 5 Here's my reason: Mister -- Nadime was  
14:08:32 6 designated as the PA representative to be examined about  
14:08:50 7 the full details of any and all searches conducted by  
14:09:00 8 the PA for documents and information responsive to each  
14:09:18 9 of the discovery requests served by plaintiffs on the --  
14:09:33 10 on the PA in this action, including, without limitation,  
14:09:47 11 any and all searches conducted by the PA for information  
14:10:01 12 responsive to the topics listed in the instant notice  
14:10:08 13 of deposition.

14:10:21 14 I was -- I see two alternatives. I can either  
14:10:26 15 go through every single request for production, which  
14:10:40 16 number over a hundred, or I can try to ask it in a more  
14:10:55 17 general way. And it seems to me that the more general  
14:10:59 18 way would suffice here, because I think Nadime's answer  
14:11:19 19 would be that he spoke with Mrs. Fadia and looked at  
14:11:34 20 the contract on the Kalkilya rental and didn't take  
14:11:40 21 any other steps to search for information or documents  
14:11:53 22 that we requested. Or that Mr. Nadime could answer by  
14:12:04 23 telling us that he did the following steps to search for  
14:12:15 24 information or documents as a whole that relate to this  
14:12:22 25 case.

14:12:29 1 I'm not -- I'm -- to be clear, I'm not asking  
14:12:31 2 you to tell me how you think I should do it. And if I  
14:12:41 3 need to, obviously I can take the hours to go through  
14:12:46 4 each request.

14:12:54 5 Based on your meeting with him, without  
14:12:57 6 asking to disclose, if you have any sense of how you  
14:13:11 7 think best to proceed on this issue that you think we  
14:13:15 8 should discuss, I'm open to hearing it.

14:13:26 9 MR. O'TOOLE: I only have two very brief  
14:13:29 10 points. The first is: I don't think there's any  
14:13:34 11 need to go through every document request, particularly  
14:13:40 12 since those requests aren't even due yet.

14:13:48 13 But the more pertinent point is: My objection  
14:13:51 14 was directed only towards the suggestion that it was  
14:14:02 15 somehow required for an American lawyer -- for an  
14:14:10 16 American lawyer to provide a Palestinian client with  
14:14:32 17 a copy of English-language American documents for the  
14:14:48 18 purposes of conducting a search for those documents.

14:15:00 19 To the extent your question asks what he did,  
14:15:08 20 I have no problem with that sort of question. To the  
14:15:19 21 extent that your question asks how the search was  
14:15:23 22 conducted with respect to documents that were provided  
14:15:27 23 to him by American counsel, I think the question has  
14:15:31 24 problems. That was my objection.

14:15:33 25 (Colloquy partially translated.)

14:15:33 1 OFFICIAL INTERPRETER BEN-NAIM: Could you  
14:15:43 2 repeat that last, please? I'm sorry.

14:15:46 3 MR. O'TOOLE: To the extent that the question  
14:15:49 4 asks how the search was conducted with respect to  
14:15:54 5 documents provided to him by American counsel for the --  
14:16:08 6 for the purpose of conducting the search, I found the  
14:16:13 7 question objectionable. But he can answer it to the  
14:16:28 8 extent he knows the answer. But he may answer the  
14:16:31 9 question to the extent he knows the answer.

14:16:35 10 (Remainder of colloquy translated.)

14:16:37 11 Q. BY MR. SCHOEN: Let me ask it this way:  
14:16:40 12 Mr. Nadime, do you know what information the plaintiffs  
14:16:45 13 have asked the defendants to provide in this case?

14:16:58 14 A. Not in detail, I don't know.

14:17:01 15 Q. Do you know what documents the plaintiffs have  
14:17:04 16 asked the defendants to produce in this case?

14:17:22 17 A. Once again?

14:17:24 18 Q. Do you know what documents -- not just  
14:17:28 19 information, but documents now -- the plaintiffs  
14:17:34 20 have asked the defendants to produce in this case?

14:17:48 21 A. No.

14:17:53 22 Q. Okay. Please tell me each and every step  
14:18:01 23 that you took or that anyone else took with whom you're  
14:18:13 24 familiar to search -- to determine -- to determine  
14:18:20 25 what searches, if any, have been made to respond to

14:18:32 1 our request for information and documents.

14:18:52 2 A. I don't know. All what I know is that I  
14:18:56 3 have -- what I have said already.

14:19:00 4 MR. SCHOEN: One second, please. Stay on  
14:19:00 5 the record.

14:19:00 6 A lot of time left on the tape? Okay.

14:19:00 7 Okay. I raised the objection earlier to  
14:24:13 8 proceeding today, given the exchange of e-mails last  
14:24:16 9 night, that incident, which we agreed not to belabor  
14:24:21 10 here too much.

14:24:30 11 So that I don't have to repeat it each time,  
14:24:38 12 we're only proceeding with this deposition and the rest  
14:24:41 13 of the depositions, reserving all objections arising  
14:24:56 14 from the events of last night that were the subject of  
14:25:02 15 e-mail exchanges. And as I said, I intend to move for  
14:25:17 16 sanctions based on those events.

14:25:23 17 OFFICIAL INTERPRETER BEN-NAIM: I'm sorry.  
14:25:24 18 I didn't hear the last.

14:25:26 19 MR. SCHOEN: "Based on those events."

14:25:31 20 However, again, in an effort to mitigate  
14:25:37 21 or to make the most out of what I consider to be a  
14:25:42 22 bad situation, I -- your colleague, Mr. McAleer, has  
14:26:03 23 identified certain documents that were produced to us  
14:26:10 24 last night in Arabic and which we have not been able  
14:26:21 25 to translate and about which I simply don't know what



14:26:31 1 they say.

14:26:33 2 But Mr. McAleer has indicated that this  
14:26:37 3 witness would be able to explain those documents to us.

14:26:46 4 So I intend to show him those documents and ask him  
14:26:50 5 to explain them, based on what Mr. McAleer has written.

14:27:00 6 But I reserve my specific objection with respect to this  
14:27:04 7 and cannot imagine a situation in which I would agree  
14:27:19 8 that it is appropriate or advisable -- advisable, a  
14:27:32 9 good idea --

14:27:39 10 (Brief exchange in Hebrew between Official  
14:27:43 11 Interpreter Ben-Naim and Mr. Haller.)

14:27:43 12 OFFICIAL INTERPRETER BEN-NAIM: "Advisable."  
14:27:43 13 Advisable -- hold on. Okay.

14:27:45 14 MR. SCHOEN: -- to simply show documents to  
14:27:53 15 a witness when I have no idea what they say.

14:28:04 16 In my view, as a lawyer for the plaintiffs,  
14:28:11 17 even doing such a thing risks prejudicing the  
14:28:18 18 plaintiffs, risks hurting the plaintiffs. I will  
14:28:42 19 have no ability to determine whether Mr. Nadime's  
14:28:51 20 description of these documents is accurate or complete.

14:29:00 21 And I mean that with no disrespect to Mr. Nadime.

14:29:24 22 I simply don't think I can do my job  
14:29:31 23 appropriately as a lawyer by proceeding this way --  
14:29:41 24 by proceeding this way. And, therefore, I reserve  
14:29:47 25 my objections.

14:29:51 1 MR. O'TOOLE: I will be brief. The defendants  
14:29:55 2 disagree with Mr. Schoen's statement, with all respect,  
14:30:06 3 and will vigorously oppose any sanctions motion, as we  
14:30:14 4 have discussed.

14:30:24 5 Defendants will also take some issue with  
14:30:33 6 counsel's representation that he has no idea what is  
14:30:45 7 in the documents produced and will note for the record  
14:31:09 8 that his co-counsel, Mr. Haller, speaks and understands  
14:31:22 9 Arabic well enough to be correcting translations of  
14:31:34 10 the certified translators during the course of today's  
14:31:48 11 deposition.

14:31:55 12 MR. HALLER: I would just state that I know  
14:31:57 13 a few words of Arabic and, from time to time, I hear  
14:32:13 14 a word that I'm not certain was translated correctly.

14:32:22 15 MR. O'TOOLE: The record will speak for  
14:32:24 16 itself.

14:32:31 17 MR. SCHOEN: The full extent of our knowledge  
14:32:33 18 of what's in these documents is reflected in an e-mail  
14:32:46 19 that I sent to Mr. McAleer, with the time stamp of  
14:33:01 20 7:43 p.m. last evening.

14:33:14 21 I'm not saying to go off the record, but I'm  
14:33:14 22 just asking how much time we have left.

14:33:28 23 Okay. We'll go off the record, but we can  
14:33:32 24 either take a break or not break.

14:33:38 25 MR. EUSTICE: Let's just switch the tapes.

14:33:41 1 MR. SCHOEN: We'll switch tapes.

14:33:41 2 MR. HALLER: I want you guys to have a talk  
14:33:41 3 with my Arabic teachers who failed me over the years.

14:33:41 4 THE VIDEOGRAPHER: Going off the record at  
14:33:45 5 2:32.

14:33:47 6 (Recess from 2:32 p.m. to 2:44 p.m.)

14:45:09 7 THE VIDEOGRAPHER: Going back on the record  
14:46:12 8 at 2:44.

14:46:17 9 (N. Al-Barahme Exhibit E marked.)

14:46:24 10 Q. BY MR. SCHOEN: Mr. Nadime, I want to show  
14:46:26 11 you what we've marked as Plaintiffs' Exhibit E for  
14:46:32 12 this deposition. These are Bates stamped 55 through  
14:46:46 13 62 -- 55 through 62, documents produced to us by the  
14:46:58 14 defendants last evening.

14:47:02 15 I'm going to ask you to look at these  
14:47:05 16 documents and review them, please. Just tell me  
14:47:38 17 when you're finished reviewing them.

14:47:54 18 A. (Examining.)

14:47:54 19 Q. Are you finished reviewing them?

14:47:56 20 A. Yes.

14:47:59 21 Q. Okay. Now, first of all, are these  
14:48:06 22 documents -- is it accurate that the -- what's written  
14:48:11 23 on each page above the double line at the top is the  
14:48:22 24 same on each page?

14:48:44 25 A. Yes.

14:48:45 1 Q. Please describe for me what's written there,  
14:48:50 2 on each page above the double line.

14:48:56 3 A. (Reading through the interpreter.)  
14:48:58 4 "PNA, Ministry of Interior and National  
14:49:06 5 Security, the Central Financial Department."

14:49:13 6 Q. And what's the symbol in the middle?

14:49:23 7 A. This is the logo of the PA, PNA.

14:49:30 8 Q. Okay. And how about, when looking at the  
14:49:33 9 page, the column by your left hand, does that appear  
14:49:46 10 to be a date the documents were printed out, if you  
14:49:52 11 can tell?

14:50:11 12 A. No. The date which appears there, it is to  
14:50:15 13 the extreme left, above the double line.

14:50:21 14 Q. Yeah. What is that date?

14:50:26 15 A. The 5th of September, 2012.

14:50:30 16 Q. And it's the same date in each spot, isn't it?

14:50:39 17 A. Yes.

14:50:40 18 Q. Do you know what that date represents, why  
14:50:42 19 that date is there?

14:50:53 20 A. I don't know. But it is clear that this is  
14:50:55 21 the date when these documents were printed, typed.

14:51:00 22 Q. Okay. What does it say after -- next to that  
14:51:06 23 date?

14:51:13 24 A. After the line?

14:51:15 25 Q. Next to the date. Just next to the date here.

14:51:23 1 A. ID number.

14:51:24 2 Q. Oh. I mean -- I'm asking about this here.

14:51:24 3 (Indicating.) I don't know if it's a word or it says  
14:51:36 4 the word "date"?

14:51:39 5 Does this say the word "date" next to the  
14:51:42 6 date?

14:51:44 7 A. Yes, the date.

14:51:45 8 Q. Just below the double line -- the double line,  
14:51:52 9 on each page there's something written; is that correct?

14:52:01 10 A. Correct.

14:52:08 11 Q. Same thing on each page?

14:52:14 12 A. No. There are some discrepancies. Each page  
14:52:28 13 clearly represents a different year.

14:52:41 14 Q. Yeah. Okay. What's -- what's written, what's  
14:52:43 15 written on each page below the double line?

14:52:47 16 A. (Reading through the interpreter.)

14:52:47 17 "Personnel, annual, list."

14:52:54 18 Q. And then each page has the year below it?

14:52:58 19 A. Correct.

14:53:01 20 Q. What do these documents appear to you to be?

14:53:17 21 A. This is a statement which is issued from  
14:53:20 22 the center -- from the national finance, which is the  
14:53:28 23 military financial department. It has to do with Major  
14:53:36 24 Ra'ed Nazzal -- Musa Ibrahim Nazzal, he's a major. It  
14:53:50 25 indicates, you know, the different months, from 1 to 12.

14:53:58 1 The district, that it could be a military classification  
14:54:04 2 for a geographic area, the first sector, dash, West  
14:54:11 3 Bank.

14:54:12 4 Q. I'm sorry. I want to ask Mr. Nadime if he --  
14:54:17 5 to only testify about what he knows from the document.  
14:54:21 6 And if he has to guess at something, just tell me that  
14:54:35 7 he's not sure.

14:54:46 8 All right. What's written in the middle  
14:54:47 9 of the page, below the year? Is that the name of  
14:54:56 10 Mr. Nazzal?

14:54:59 11 A. Ra'ed Musa Ibrahim Nazzal.

14:55:05 12 Q. And that's the same on every page here?

14:55:10 13 A. Yes.

14:55:10 14 Q. You believe this is all Mr. Nazzal's file, all  
14:55:14 15 of these documents relate to Mr. Ra'ed Nazzal; correct?

14:55:28 16 A. As is written in it.

14:55:31 17 Q. Okay. Have you ever seen documents that look  
14:55:34 18 like these before?

14:55:41 19 A. No.

14:55:43 20 Q. Do you have any idea -- sorry?

14:55:47 21 A. This is not issued from the Ministry of  
14:55:48 22 Finance, but rather from the military administration  
14:55:56 23 of finances.

14:55:58 24 Q. Are you familiar with this kind of document?

14:56:05 25 A. No.

14:56:06 1 Q. Do you think you can tell us what this  
14:56:09 2 document says?  
14:56:20 3 A. Through my observation --  
14:56:22 4 Q. Okay. Let's start from the right column.  
14:56:29 5 You see the numbers 1, 2, 3, through 12?  
14:56:36 6 A. Yes.  
14:56:37 7 Q. Each one represents a different month,  
14:56:42 8 January, February?  
14:56:45 9 A. Yes.  
14:56:46 10 Q. Okay. And you see the number "81762"?  
14:57:02 11 A. Yes.  
14:57:03 12 Q. That's the same number on every page in the  
14:57:07 13 same place; right?  
14:57:13 14 A. Correct.  
14:57:15 15 Q. Do you know what that number represents?  
14:57:24 16 A. As is indicated, this is the financial number.  
14:57:31 17 Q. What does that mean?  
14:57:38 18 A. Financial reference for Ra'ed Musa Ibrahim  
14:57:41 19 Nazzal. This is his reference number in the military  
14:57:50 20 finance department.  
14:57:53 21 Q. Okay. And how about all the way over in the  
14:57:56 22 other column is another number, "944700574."  
14:58:14 23 Do you see that number?  
14:58:16 24 A. Yes.  
14:58:16 25 Q. Same number -- that's the same number on each

14:58:18 1 page; right?

14:58:18 2 A. Yes.

14:58:19 3 Q. What does that number signify, if you know?

14:58:27 4 A. The ID number.

14:58:29 5 Q. Mr. Nazzal's ID number?

14:58:31 6 A. This is what it's supposed to be.

14:58:33 7 Q. All right. Now back to the right column,  
14:58:36 8 number 1. That column, all the way down on that page,  
14:58:43 9 all says the same thing?

14:58:45 10 A. Yes.

14:58:46 11 Q. What does that column say?

14:58:53 12 A. This is military classification, having to do,  
14:58:57 13 you know, with the first sector, West Bank, dividing the  
14:59:02 14 place geographically.

14:59:08 15 Q. What does it say?

14:59:10 16 A. The first sector, West Bank. I don't know  
14:59:12 17 what this means.

14:59:14 18 Q. You don't know if it means Nazzal lived there  
14:59:17 19 or was assigned there?

14:59:32 20 A. The place of -- the place of functioning, you  
14:59:38 21 can see it in the second column.

14:59:41 22 Q. What's the first column? What does it say,  
14:59:43 23 the heading of the first column?

14:59:47 24 A. The sector.

14:59:48 25 Q. And the next heading, what does the next



14:59:52 1 heading say?

14:59:53 2 A. "Management."

14:59:54 3 Q. What does that mean? What is that?

15:00:01 4 A. Where he works, the administrative part.

15:00:04 5 Where he works and where is his posting.

15:00:09 6 Q. What does it say there? By the number 1, what  
15:00:14 7 was his posting?

15:00:18 8 A. The command, Jericho.

15:00:23 9 Q. And how about -- and how about after that,  
15:00:36 10 starting from number 2 down to number 12?

15:00:39 11 A. The general headquarters, the northern  
15:00:40 12 governorates.

15:00:44 13 Q. What area is that? Can you tell me some  
15:00:47 14 towns in that area?

15:00:52 15 A. The general headquarters, it means the  
15:00:56 16 northern governorates of the West Bank. The general  
15:01:06 17 headquarters of the national security. This means that  
15:01:14 18 if somebody is transferred to the general headquarters,  
15:01:25 19 it means he does not have a specific task; they don't  
15:01:30 20 let him work.

15:01:32 21 Q. He doesn't do any work?

15:01:39 22 A. My understanding, if it is in the general  
15:01:44 23 headquarters, he doesn't work.

15:01:46 24 Q. But he's being paid money during this time;  
15:01:51 25 right?

15:01:54 1 A. He is there because he is existing. He is  
15:01:57 2 not sitting at home.

15:01:58 3 Q. Oh. He's physically in the general  
15:02:02 4 headquarters?

15:02:06 5 A. Yes.

15:02:06 6 Q. Okay. What's the next column?

15:02:11 7 A. "Rank."

15:02:14 8 Q. What's his rank on this first page for 2000?

15:02:24 9 A. Sergeant --

15:02:26 10 MR. HALLER: "Captain."

15:02:30 11 OFFICIAL INTERPRETER AGHAZARIAN: "Captain."

15:02:30 12 Sorry.

15:02:32 13 MR. HALLER: George, do you agree? Is it  
15:02:33 14 "captain"?

15:02:37 15 CHECK INTERPRETER HAZOU: Yes.

15:02:39 16 Q. BY MR. SCHOEN: Okay. Just focus on the rank  
15:02:41 17 column. Page "2000," he is captain the whole time;  
15:02:46 18 right?

15:02:51 19 A. Correct.

15:02:52 20 Q. The next page is "2001"; right?

15:02:59 21 A. Yes.

15:03:01 22 Q. Page -- sorry. Section -- the year 2002,  
15:03:06 23 page 3, Bates stamped 57?

15:03:20 24 OFFICIAL INTERPRETER BEN-NAIM: 57?

15:03:20 25 MR. SCHOEN: Bates stamped 57.

15:03:25 1 Q. BY MR. SCHOEN: On the bottom. On the bottom.  
15:03:29 2 For the year 2002, you see "rank"?  
15:03:36 3 A. Correct.  
15:03:36 4 Q. Did Nazzal's rank change during the year 2002?  
15:03:43 5 A. Correct.  
15:03:45 6 Q. When does it change, according to these  
15:03:48 7 documents?  
15:03:57 8 A. In -- in May, starting from May 2002.  
15:04:02 9 Q. What was his rank? What was Nazzal's rank  
15:04:05 10 starting in May 2002?  
15:04:17 11 A. You mean in the -- after the month of May or  
15:04:21 12 in 2002?  
15:04:22 13 Q. In 2002, after the month of April, starting  
15:04:25 14 in May, what is Nazzal's rank?  
15:04:40 15 A. From January 2002 until April 2002, he was  
15:04:45 16 a captain.  
15:04:48 17 Q. Right. And then --  
15:04:49 18 A. He became a major after the month of May.  
15:04:55 19 Q. Starting in May 2002, he became a major?  
15:05:07 20 A. As indicated, yes.  
15:05:09 21 Q. And major is a higher rank than captain?  
15:05:14 22 A. Yes.  
15:05:16 23 Q. Major reflects a promotion?  
15:05:21 24 A. Yes.  
15:05:23 25 Q. Okay. Let's go --

15:05:25 1 A. (In English.) Okay.

15:05:29 2 Q. Let's go to the next column.

15:05:32 3 A. From the first page?

15:05:35 4 Q. I'm sorry. Where does it say -- if you would,

15:05:53 5 please, turn to the page for 2001. 2001.

15:06:04 6 Do you see a change in the column, the second

15:06:10 7 column, starting in the fourth month?

15:06:16 8 A. Yes, I do. Yes.

15:06:17 9 Q. And what is the change that you see reflected

15:06:23 10 there?

15:06:28 11 A. A change in the location of work, national

15:06:37 12 security, Kalkilya.

15:06:39 13 Q. Starting in?

15:06:48 14 A. From April 2001.

15:06:51 15 Q. And until when? Until when is that, the

15:06:54 16 provision in that column?

15:07:06 17 A. Until May 2002.

15:07:09 18 Q. Until May 2002. And before May -- before

15:07:18 19 it was -- you called it national security Kalkilya?

15:07:26 20 A. Yes.

15:07:27 21 Q. Up until May of 2002?

15:07:30 22 A. Yes.

15:07:31 23 Q. And what about after May of 2002?

15:07:42 24 A. Actually, it's still June of 2002, not May.

15:07:49 25 Q. Right, until June.

15:07:53 1 A. (In English.) June.

15:07:54 2 Q. Through June -- through the month of June  
15:07:57 3 and starting in July of 2002, that column changed;  
15:08:05 4 right?

15:08:12 5 A. Yeah. That's true.

15:08:14 6 Q. What does it say in that column, starting  
15:08:19 7 July of 2002?

15:08:26 8 A. Clearly that it has to do with martyrs and  
15:08:31 9 detainees.

15:08:33 10 Q. What does that mean to you?

15:08:35 11 A. I don't know.

15:08:37 12 Q. How about in the "rank" column?

15:08:43 13 A. I know that if his salary -- I know that if  
15:08:53 14 he is listed as martyr or detainees, that it should  
15:08:59 15 not be paid through the military financial management.

15:09:04 16 Q. "Should not be"?

15:09:15 17 A. The Department of Martyrs and Detainees should  
15:09:21 18 take over.

15:09:27 19 MR. SAADI: "And wounded."

15:09:29 20 OFFICIAL INTERPRETER AGHAZARIAN: "And the  
15:09:29 21 wounded, should take over the payment of the amounts."

15:09:36 22 MR. SCHOEN: What's the translation now? That  
15:09:38 23 was Mr. Saadi.

15:09:42 24 OFFICIAL INTERPRETER AGHAZARIAN: I used  
15:09:42 25 "detainees." I used "detainees." It should have been

15:09:45 1 "the wounded."

15:09:47 2 MR. SAADI: Yes. Not "detainees."

15:09:50 3 MR. SCHOEN: Okay.

15:09:50 4 (Brief exchange in Arabic among Official  
15:10:12 5 Interpreter Aghazarian, Official Interpreter  
15:10:12 6 Ben-Naim, Check Interpreter Hazou, Mr. Saadi,  
15:10:12 7 and the witness.)

15:10:18 8 THE WITNESS: I'm speaking here martyrs and  
15:10:22 9 detainees.

15:10:25 10 MR. SAADI: I'm sorry.

15:10:25 11 Q. BY MR. SCHOEN: Let's go to that "rank" column  
15:10:31 12 again.

15:10:32 13 After it changed to major, which was May of  
15:10:36 14 2002, does it stay the same all the way through 2007?

15:11:02 15 A. Correct.

15:11:05 16 Q. You don't know why these documents just start  
15:11:07 17 in 2000, do you?

15:11:11 18 (Pending question partially translated.)

15:11:11 19 OFFICIAL INTERPRETER BEN-NAIM: 2000 and?

15:11:11 20 MR. SCHOEN: 2000.

15:11:11 21 (Remainder of pending question translated.)

15:11:11 22 THE WITNESS: I don't know.

15:11:33 23 Q. BY MR. SCHOEN: If you know?

15:11:34 24 A. I don't have an idea. But it is clear -- I  
15:11:34 25 don't know.

15:11:35 1 Q. And you don't know why these documents end --  
15:11:38 2 that we have been given, end in 2007, do you?

15:11:43 3 A. Also I don't know.

15:11:57 4 Q. Let's go to the next column.

15:12:00 5 What's the "plus zero" mean? Do you know?

15:12:11 6 A. I am not a military expert in order to  
15:12:16 7 decipher codes. But this could be years of priority  
15:12:22 8 in the rank.

15:12:25 9 Q. Okay. Anyway, you're not sure what it means,  
15:12:28 10 "plus zero"?

15:12:30 11 A. I'm not sure.

15:12:31 12 Q. What about the next column, what does that  
15:12:36 13 column signify, the column after "rank," moving to the  
15:12:43 14 left?

15:12:44 15 A. Social status.

15:12:47 16 Q. What does that mean?

15:12:50 17 A. Mean -- it means "married."

15:12:56 18 Q. So 2000 and 2001, that appears to be the same  
15:13:05 19 all the way through; right?

15:13:07 20 A. No. In 2000, no.

15:13:12 21 Q. I thought we were talking about 2000.

15:13:19 22 A. In 2001 --

15:13:22 23 Q. 2000.

15:13:27 24 A. In 2000, no. In January 2001, starting from  
15:13:35 25 February 2001, he married.

15:13:39 1 Q. So he's not married -- according to these  
15:13:43 2 documents, he's not married through 2000. And it  
15:13:49 3 appears he got married in February of 2001?

15:14:05 4 OFFICIAL INTERPRETER BEN-NAIM: Two thousand  
15:14:05 5 and what he got married?

15:14:07 6 (Comment in Arabic by Official Interpreter  
15:14:07 7 Aghazarian.)

15:14:07 8 THE WITNESS: According to my understanding  
15:14:17 9 and explanation, yes.

15:14:18 10 Q. BY MR. SCHOEN: Okay. Now, there appears to  
15:14:20 11 be a change in that starting in June of 2003.

15:14:44 12 A. I don't see a change. Where is the change?

15:14:46 13 Q. In that column on "status."

15:14:51 14 Do you see, starting in June of 2003, the mark  
15:15:02 15 looks different in that column from before June of 2003?

15:15:18 16 A. This means married dash zero, which means  
15:15:22 17 there are no children. That's all.

15:15:25 18 Q. But before June -- but before June of 2003,  
15:15:28 19 you said he showed married?

15:15:34 20 A. (In English.) Married, dash, no children.

15:15:37 21 (Translated.) Dash, which means that there  
15:15:42 22 are no children.

15:15:43 23 Q. So no children if there's a zero, and no  
15:15:43 24 children if there's no zero?

15:15:56 25 A. I think so.



15:15:57 1 Q. How about the next column, it looks like  
15:16:01 2 there's a header but nothing written under it; correct?

15:16:11 3 A. Here it's written the rank.

15:16:20 4 Q. Okay. So if you turn to March -- yes, March  
15:16:25 5 of 2004, it appears now that there is something in that  
15:16:29 6 column for the first time; correct?

15:16:33 7 A. Correct.

15:16:34 8 Q. What does that say in that column, starting  
15:16:37 9 in March of 2004?

15:16:42 10 A. "The martyrs."

15:16:45 11 Q. What does that signify to you, that it says  
15:16:51 12 "the martyrs"?

15:16:57 13 A. It may be that he could have been transferred  
15:17:02 14 to the account of the martyrs.

15:17:07 15 Q. Uh huh. Oh, I see. So it's the bank that's  
15:17:11 16 paying the money out, not the bank that's getting money,  
15:17:15 17 in that column?

15:17:18 18 A. For sure, yes.

15:17:22 19 Q. How about the next column over, moving to the  
15:17:25 20 left, what's that -- the header for that column say?

15:17:35 21 A. "The requirements."

15:17:37 22 Q. What does that mean?

15:17:41 23 A. (In English.) I don't know.

15:17:45 24 (Translated.) I don't know.

15:17:49 25 Q. You see a number under that column, in 2000,

15:17:55 1 it says "234.725"?

15:18:05 2 OFFICIAL INTERPRETER BEN-NAIM: "725"?

15:18:09 3 MR. SCHOEN: Yes.

15:18:11 4 Q. BY MR. SCHOEN: And then it changes in  
15:18:13 5 February of 2001 to "244.725."

15:18:27 6 So far you agree with that?

15:18:32 7 A. Yes, I do.

15:18:33 8 Q. Then if you go to 2002, that number changes  
15:18:41 9 again around May and again in July. And then in July  
15:19:02 10 of 2002, it changes to "211.6" and stays that number  
15:19:15 11 all the way through?

15:19:21 12 A. Correct.

15:19:22 13 Q. Do you know what that number means, any of  
15:19:25 14 those numbers?

15:19:29 15 A. No, I don't. I don't know. These are  
15:19:38 16 accounting codes and ciphers. Could be. Could be,  
15:19:44 17 not for sure.

15:19:46 18 Q. And how about for the next column over, what  
15:19:48 19 does the next heading say, moving to the left?

15:19:54 20 A. "Amounts that are cut."

15:19:58 21 Q. What does that mean?

15:20:03 22 A. I don't know.

15:20:04 23 MR. SCHOEN: What does the term mean, "amounts  
15:20:08 24 that are cut," even, do you know?

15:20:13 25 OFFICIAL INTERPRETER AGHAZARIAN: "Deductions."

15:20:15 1 MR. SAADI: "Deductions."

15:20:17 2 MR. SCHOEN: He didn't say that, though, did  
15:20:19 3 he?

15:20:20 4 OFFICIAL INTERPRETER BEN-NAIM: He read it in  
15:20:22 5 Arabic.

15:20:22 6 MR. SCHOEN: That's the translation, though,  
15:20:22 7 is "deductions"?

15:20:23 8 OFFICIAL INTERPRETER AGHAZARIAN: I used the  
15:20:25 9 word "amounts cut." "Deductions" is more accurate.

15:20:33 10 MR. SCHOEN: Very good.

15:20:34 11 Q. BY MR. SCHOEN: And that number changes  
15:20:36 12 periodically until we get -- until we get to July of  
15:20:40 13 2002; right?

15:20:49 14 A. Right.

15:20:52 15 Q. And then that number changes to 2001 for  
15:20:58 16 the rest of the way through -- for the rest of the  
15:20:58 17 way through?

15:20:59 18 A. Let me relieve you. It's clear that you  
15:21:03 19 have -- you have deductions and, when the salary  
15:21:07 20 changes, automatically the deductions will also change.

15:21:12 21 Q. I see.

15:21:14 22 A. We go a straight way.

15:21:17 23 Q. What's the currency that's reflected here?  
15:21:19 24 Do you know?

15:21:23 25 A. Shekels. It says, it's clear. It's shekels.

15:21:26 1 Q. Shekels. That's Israeli shekels?

15:21:30 2 A. Yes.

15:21:30 3 Q. Okay. And so if it says here "39.06," you

15:21:43 4 understand that to mean in this first column, for --

15:21:46 5 in the column on 2000, 39.06 shekels were deducted

15:21:55 6 from the amount paid to him?

15:22:04 7 A. Yes.

15:22:05 8 Q. Okay. And the last column, moving to the

15:22:07 9 left?

15:22:10 10 A. It is "net," the net of what has been paid,

15:22:15 11 in net.

15:22:17 12 Q. Before we get to the bottom, which I think is

15:22:21 13 what you mean, you see where it appears, "1,882.29" --

15:22:33 14 OFFICIAL INTERPRETER BEN-NAIM: 1,882 point?

15:22:38 15 MR. SCHOEN: 29.

15:22:43 16 Q. BY MR. SCHOEN: -- for the year 2000?

15:22:47 17 A. Yes.

15:22:47 18 Q. In each month?

15:22:49 19 A. Yes.

15:22:52 20 (Brief exchange in Arabic between Official

15:22:52 21 Interpreter Ben-Naim and Check Interpreter Hazou.)

15:22:57 22 OFFICIAL INTERPRETER BEN-NAIM: "Month." He

15:22:59 23 said "month."

15:23:00 24 MR. SCHOEN: Are you okay with that?

15:23:04 25 CHECK INTERPRETER HAZOU: Yes.

15:23:04 1 Q. BY MR. SCHOEN: Okay. What's the heading of  
15:23:06 2 that column say?

15:23:08 3 A. "Net." "Net amount in shekels."

15:23:13 4 Q. Okay. So you read this page for 2000 to mean  
15:23:18 5 Nazzal was being paid 1,882.29 shekels each month?

15:23:38 6 A. Yes.

15:23:39 7 Q. And the number on the bottom of that page,  
15:23:44 8 it says "22,587.48," you understand that to be the net  
15:24:02 9 total for that year?

15:24:13 10 A. It is the total amount paid in that year.

15:24:17 11 Q. Okay. What's the -- there appears to be a  
15:24:21 12 word next to -- the fourth from the bottom, 1,882.29.  
15:24:33 13 It looks like maybe there is a word next to that.

15:24:37 14 Do you see it?

15:24:39 15 A. "Securities."

15:24:40 16 Q. "Securities"?

15:24:41 17 A. "Securities."

15:24:42 18 Q. "Securities" meaning like stocks or something  
15:24:45 19 like that? Something different from money?

15:24:49 20 Or "security" meaning "safety"?

15:24:58 21 A. Which is I trust you, you know, like I put a  
15:25:02 22 trusted amount.

15:25:04 23 MR. HALLER: "In trust"?

15:25:08 24 OFFICIAL INTERPRETER AGHAZARIAN: "In trust."

25 //

(Brief exchange in Hebrew between Official Interpreter Ben-Naim and Mr. Haller.)

OFFICIAL INTERPRETER BEN-NAIM: I don't want to get into, you know, also Hebrew.

THE WITNESS: Which is -- which is linked to the account. It's like securities.

Q. BY MR. SCHOEN: Okay.

A. So in that month, he did not take his salary, so it is reserved for him.

Q. I see. That was October of 2000. All right.

Looking at each other page, it follows the same pattern; correct?

That column shows how much Nazzal was paid each month, and then at the bottom it shows the total amount paid for that year in shekels?

A. Correct.

Q. Okay. Let me ask you: At the Ministry of Finance, do you know whether there is an audit done periodically, every so often?

A. In the Ministry of Finance?

Q. Yes, for example.

A. We have two phases of auditing: Control before paying, every transaction has to pass through an internal monitoring procedure. Every -- absolutely every transaction must pass through an internal auditing

15:27:35 1 department. And there is auditing after the payment,  
15:27:39 2 post payment. And auditing is not on every transaction,  
15:27:48 3 but sample transactions are selected.

15:27:53 4 Q. Who does that auditing?

15:28:02 5 A. The internal auditing, monitoring, is  
15:28:06 6 something which is within the Ministry of Finance,  
15:28:10 7 internal. External auditing, it has to do with  
15:28:19 8 the money that is with administrative and financial  
15:28:23 9 auditing.

15:28:27 10 It is a separate, independent body, which  
15:28:31 11 is established by a special decree or law. It has  
15:28:37 12 administrative and financial independence, and it  
15:28:46 13 handles the question of auditing on all Palestinian  
15:28:51 14 official bodies, including the Ministry of Finance.  
15:28:54 15 And by law, it presents its annual report -- annual,  
15:29:07 16 not monthly. And it presents it to the PLC, the  
15:29:16 17 legislative council, and to the president as well.

15:29:21 18 Q. Is there an outside agency that also does  
15:29:26 19 an audit? In other words, does the American government,  
15:29:30 20 that you're aware of, ever perform an audit?

15:29:34 21 OFFICIAL INTERPRETER BEN-NAIM: Do you want  
15:29:35 22 me to translate all of what you said?

15:29:38 23 MR. SCHOEN: No.

15:29:38 24 OFFICIAL INTERPRETER BEN-NAIM: Okay.

15:29:38 25 Q. BY MR. SCHOEN: Does the American government

15:29:41 1 perform an audit of any PA institution that you're aware  
15:29:47 2 of?

15:29:48 3 A. I don't know.

15:29:54 4 Q. Have you ever heard of something called the  
15:29:56 5 Palestine Information Center?

15:30:18 6 A. I haven't.

15:30:20 7 Q. Are you aware of an announcement by President  
15:30:24 8 Abbas -- back up a second.

15:30:36 9 President Abbas is the president of the PA?

15:30:39 10 A. Yes.

15:30:40 11 Q. Are you aware of an announcement by President  
15:30:43 12 Abbas in October of 2010, or any other time, that he  
15:31:02 13 was ordering the suspension of the financial monthly  
15:31:18 14 allocation of the PFLP because the PFLP was not  
15:31:34 15 supporting Mr. Abbas and his policies?

15:31:45 16 A. I don't know.

15:31:46 17 Q. Not familiar with it?

15:31:50 18 A. And I am -- I am taken by surprise that such  
15:31:55 19 an announcement might have been. There is no president  
15:32:03 20 that will state that I cut these allocations, if there  
15:32:13 21 are -- if there are such allocations.

15:32:16 22 Q. Are you familiar with any complaints by any --  
15:32:20 23 publicly, by any members of the PFLP --

15:32:20 24 OFFICIAL INTERPRETER BEN-NAIM: Sorry. I  
15:32:23 25 didn't hear the question.



15:32:25 1 Q. BY MR. SCHOEN: Are you familiar with any  
15:32:26 2 public complaints or private complaints by members  
15:32:30 3 of the PFLP that their allocation -- their monthly  
15:32:41 4 allocation to the PFLP from the PA is too small and  
15:32:52 5 should be increased?

15:32:56 6 A. I don't know.

15:32:59 7 Q. Have you seen any public report --

15:33:01 8 OFFICIAL INTERPRETER BEN-NAIM: "Public"?

15:33:08 9 Q. BY MR. SCHOEN: -- public report or private  
15:33:09 10 report listing a dollar figure -- listing a figure in  
15:33:15 11 money, in an amount of money --

15:33:25 12 (Brief exchange in Arabic between Official  
15:33:26 13 Interpreter Ben-Naim and Mr. Saadi.)

15:33:30 14 Q. BY MR. SCHOEN: -- listing an amount of money  
15:33:37 15 that the PFLP receives each month in an allocation?

15:33:46 16 A. I don't know.

15:33:47 17 Q. And I refer you specifically to Al-Jazeera.  
15:33:52 18 Have you ever seen such an announcement in  
15:33:57 19 Al-Jazeera?

15:34:02 20 A. No, I haven't seen it. And not everything  
15:34:10 21 which is issued by Al-Jazeera and the satellites is  
15:34:15 22 correct.

15:34:16 23 Q. You've testified already that in 2010 --  
15:34:47 24 December 19th, 2010, you were --

15:34:57 25 OFFICIAL INTERPRETER BEN-NAIM: The date

15:34:58 1 again, please?

15:35:00 2 Q. BY MR. SCHOEN: -- December 19th, 2010,  
15:35:06 3 you were the chair of the -- you were the chair of  
15:35:12 4 the Palestine land office; correct?

15:35:18 5 A. Correct.

15:35:18 6 Q. Are there faxes sent out of that office?  
15:35:33 7 Correct?

15:35:34 8 A. From which office? My office?

15:35:36 9 Q. Let me show you a header and ask you if this  
15:35:39 10 is the header of a fax from your office, the chairman  
15:35:43 11 of the land office.

15:35:48 12 MR. SCHOEN: I'll mark this three-page  
15:35:52 13 document -- I'll mark this three-page document  
15:35:56 14 Exhibit F, like "Frank."

15:36:08 15 MR. O'TOOLE: Just a quick question. Has  
15:36:10 16 this document been produced in this case?

15:36:15 17 MR. HALLER: I don't believe so.

15:36:16 18 MR. O'TOOLE: Not before today? So these  
15:36:23 19 are documents that we are receiving for the first  
15:36:26 20 time in this deposition, which you are questioning on?

15:36:29 21 MR. HALLER: This is a document in the  
15:36:30 22 defendants' --

15:36:32 23 MR. O'TOOLE: This is a document that has not  
15:36:33 24 been produced in discovery, as I understand it. I just  
15:36:39 25 want to note that, because I think it's somewhat ironic.

15:36:41 1 MR. SCHOEN: I'm only asking him one question,  
15:36:44 2 whether that's his fax header on top.

15:36:48 3 MR. O'TOOLE: We have no objection.

15:36:48 4 THE WITNESS: Our name, it's supposed to be  
15:37:19 5 the Land Authority, on the logo.

15:37:25 6 (Court reporter clarification.)

15:37:25 7 OFFICIAL INTERPRETER AGHAZARIAN: That "our  
15:37:25 8 name should be the Land Authority, on the logo."

15:37:47 9 Q. BY MR. SCHOEN: If I may, Mr. Nadime, how many  
15:37:52 10 pages is that document? Three pages?

15:37:55 11 A. Three pages, yes.

15:37:57 12 MR. SCHOEN: I'm going to add three more  
15:38:00 13 pages, and we'll still call it all the six-page  
15:38:04 14 document, Exhibit F like "Frank."

15:38:12 15 (N. Al-Barahme Exhibit F marked.)

15:38:12 16 Q. BY MR. SCHOEN: Let me direct your attention  
15:38:22 17 to the last page of the document, what appears to be  
15:38:31 18 your signature.

15:38:32 19 Is that your signature?

15:38:33 20 A. (Examining.) This is correct.

15:38:36 21 Q. All right. Now, look at the header on that  
15:38:39 22 page. It says -- does that refresh your recollection  
15:38:44 23 at all as to whether --

15:38:48 24 A. It's the same logo.

15:38:50 25 Q. And is that the logo from your office,

15:38:53 1 chairman of the land office?

15:38:57 2 A. Believe me, it's the first time I pay  
15:39:00 3 attention to the logo.

15:39:02 4 Q. I see. So you don't know one way or the  
15:39:05 5 other?

15:39:11 6 A. What do you mean by that?

15:39:13 7 Q. Do you know whether that's your logo from your  
15:39:16 8 office for the fax?

15:39:24 9 A. Clearly, yes. This is the logo of my office.

15:39:27 10 MR. SCHOEN: Okay. Nothing further. I have  
15:39:36 11 no further questions.

15:39:38 12 MR. O'TOOLE: I have two -- one very brief  
15:39:41 13 objection and then -- and one offer.

15:39:44 14 MR. SCHOEN: I just want to put this document  
15:39:46 15 all together.

15:39:55 16 MR. O'TOOLE: The first objection is that  
15:39:57 17 we are now receiving for the first time documents --  
15:40:00 18 foreign-language documents, in Hebrew, that were not  
15:40:05 19 provided in discovery --

15:40:06 20 OFFICIAL INTERPRETER BEN-NAIM: In Hebrew;  
15:40:06 21 right?

15:40:12 22 MR. O'TOOLE: Yes.

15:40:12 23 -- and of questionable relevance to this  
15:40:18 24 deposition, to the extent that we can determine what  
15:40:30 25 they mean.

15:40:42 1 The second is an offer. I note, before the  
15:40:46 2 questioning with respect to the financial documents,  
15:41:00 3 counsel noted that he had not been able to sufficiently  
15:41:04 4 translate the documents before the questioning. And  
15:41:21 5 I note that there are three highly qualified Arabic  
15:41:27 6 translators in the room. And if counsel would like,  
15:41:40 7 the defendants would have no objection to taking a  
15:41:43 8 short recess so that counsel may consult with these  
15:42:00 9 translators, to ensure that any translation issues are  
15:42:11 10 resolved now and that he is able to conduct questioning.

15:42:16 11 MR. SCHOEN: First of all, I'd be happy to  
15:42:18 12 consult with them, to the extent I understood this to  
15:42:25 13 be implied in the question or offer or a premise of  
15:42:33 14 the offer.

15:42:34 15 OFFICIAL INTERPRETER BEN-NAIM: I agree.

15:42:34 16 MR. SCHOEN: I certainly don't agree that  
15:42:52 17 getting -- confirming a translation now with the  
15:43:01 18 translators would cure all of the problems that  
15:43:13 19 underlie this incident. But I'm happy to take advantage  
15:43:19 20 of having the translators here to at least do that part  
15:43:23 21 of it.

15:43:31 22 How long would you suggest we take for a  
15:43:33 23 break? What would be fair?

15:43:36 24 MR. O'TOOLE: Whatever you need to resolve  
15:43:36 25 these issues.

15:43:36 1 MR. SCHOEN: Okay. So let me try the process  
15:43:42 2 and see how long it takes, I guess, is the only way I  
15:43:44 3 can see. And we're just referring now to the documents  
15:43:53 4 I questioned him on today, Bates 55 to 62, Exhibit E;  
15:44:08 5 correct?

15:44:08 6 (Colloquy partially translated.)

15:44:09 7 OFFICIAL INTERPRETER BEN-NAIM: Exhibits?

15:44:09 8 MR. SCHOEN: 55 -- Exhibit E.

15:44:09 9 OFFICIAL INTERPRETER BEN-NAIM: "E" or "A"?

15:44:09 10 MR. SCHOEN: "E."

15:44:09 11 (Remainder of colloquy translated.)

15:44:09 12 MR. SCHOEN: And I only ask that question  
15:44:36 13 because, among the other documents produced, for  
15:44:39 14 example, Bates stamp 63 through 67, we don't find  
15:44:53 15 the documents even to be legible. I can't read what's  
15:44:56 16 on the page in any language. But as to 55 through 62,  
15:45:06 17 we'll sit now with the translators.

15:45:18 18 THE VIDEOGRAPHER: Going off the record at  
15:45:19 19 3:43.

15:45:20 20 (Recess from 3:43 p.m. to 3:58 p.m.)

15:58:47 21 THE VIDEOGRAPHER: Going back on the record  
16:00:16 22 at 3:58.

16:00:20 23 Q. BY MR. SCHOEN: During the break, I had  
16:00:21 24 a chance, as suggested by defense counsel, to review  
16:00:30 25 the translation of this document, Exhibit E. In

16:00:44 1 that regard, my effort was to try to see whether the  
16:00:49 2 translator agreed with the translation of certain  
16:00:55 3 terms on the document.

16:01:00 4 Principally, we went over the headings.  
16:01:05 5 There was only one word that the translator was not  
16:01:09 6 sure of. It's the word that's the heading on the  
16:01:15 7 third-to-the-left-most column. It appears over the  
16:01:23 8 numbers which I believe you described as some sort of  
16:01:30 9 government code, possibly, that you weren't familiar  
16:01:40 10 with.

16:01:43 11 Let me just ask you again if you can read  
16:01:46 12 the word, the heading.

16:01:56 13 A. The word it is --

16:02:03 14 OFFICIAL INTERPRETER AGHAZARIAN:

16:02:04 15 "Prerequisites"? "Requirements"?

16:02:12 16 CHECK INTERPRETER HAZOU: "Merits." "Merits."

16:02:13 17 MR. SCHOEN: Do you want to look at the word  
16:02:13 18 again?

16:02:14 19 CHECK INTERPRETER HAZOU: "Merits." Whatever  
16:02:14 20 is the amount due.

16:02:19 21 MR. SCHOEN: I didn't hear.

16:02:21 22 CHECK INTERPRETER HAZOU: Whatever is the  
16:02:24 23 amount due you.

16:02:27 24 MR. SCHOEN: Whatever it is you're entitled  
16:02:28 25 to, you mean?

16:02:31 1 CHECK INTERPRETER HAZOU: Yes.

16:02:32 2 MR. SCHOEN: And then it's a code underneath?

16:02:32 3 The numbers are under some kind of government code?

16:02:32 4 Albert?

16:02:35 5 OFFICIAL INTERPRETER AGHAZARIAN: I don't

16:02:36 6 agree with the term "merits."

16:02:38 7 Q. BY MR. SCHOEN: Have you read the word?

16:02:43 8 OFFICIAL INTERPRETER AGHAZARIAN: Yes, he read

16:02:43 9 it.

16:02:47 10 (Comment in Arabic by Official Interpreter

16:02:47 11 Aghazarian.)

16:02:50 12 MR. SCHOEN: How would you translate it?

16:02:51 13 OFFICIAL INTERPRETER AGHAZARIAN: "Obligations

16:02:51 14 to meet." That's the meaning.

16:02:51 15 MR. SCHOEN: Obligations that have to be met?

16:02:57 16 OFFICIAL INTERPRETER AGHAZARIAN: Yes.

16:02:58 17 MR. SCHOEN: How does that do with you,

16:02:58 18 George? Do you agree?

16:03:03 19 CHECK INTERPRETER HAZOU: No.

16:03:04 20 MR. SCHOEN: "Merit" is the word you're coming

16:03:04 21 up with?

16:03:04 22 CHECK INTERPRETER HAZOU: Yes.

16:03:04 23 MR. SCHOEN: It's close, though. It sounds

16:03:04 24 like something close between them.

16:03:05 25 Do you understand the word "merit," as its



16:03:07 1 used there, to mean what the person has earned or what  
16:03:09 2 he's entitled to?

16:03:12 3 CHECK INTERPRETER HAZOU: What he's entitled,  
16:03:12 4 the dues that he's entitled to.

16:03:16 5 MR. SCHOEN: Do you agree with that?

16:03:18 6 OFFICIAL INTERPRETER AGHAZARIAN: In order  
16:03:18 7 to proceed --

16:03:19 8 MR. SCHOEN: I just want an accurate  
16:03:19 9 translation. But "dues that he's entitled to," it  
16:03:22 10 sounds like you're saying almost the same thing. No?

16:03:24 11 OFFICIAL INTERPRETER AGHAZARIAN: "Dues."

16:03:26 12 MR. SCHOEN: But "dues" sounds like something  
16:03:28 13 he owes. The word "dues" -- this is more entitlement.

16:03:33 14 OFFICIAL INTERPRETER AGHAZARIAN: It's the  
16:03:33 15 contrary of "dues," actually.

16:03:33 16 CHECK INTERPRETER HAZOU: "Entitlements."

16:03:33 17 OFFICIAL INTERPRETER AGHAZARIAN:

16:03:33 18 "Entitlements."

16:03:35 19 MR. SCHOEN: With that, I have no further  
16:03:40 20 questions of this witness.

16:03:41 21 MR. O'TOOLE: And we have no questions at this  
16:03:43 22 time.

16:03:46 23 MR. SCHOEN: I just want to propose now:  
16:03:49 24 We've spoken among ourselves. What we think is  
16:03:54 25 appropriate, given the time of the day, given that

16:04:02 1 the translators need to leave, given that I would  
16:04:08 2 want a half-hour break now, given the hour we started,  
16:04:19 3 our issue with the documents produced last night, and  
16:04:27 4 my belief that I can help streamline things by working  
16:04:32 5 through questions tonight, we want to reconvene the  
16:04:40 6 depositions tomorrow morning.

16:04:44 7 We will be prepared to start at 9:00 a.m.  
16:04:47 8 and try to get through all of it tomorrow, if possible.

16:04:51 9 (Comment in Arabic by the witness.)

16:05:02 10 OFFICIAL INTERPRETER AGHAZARIAN: He says:  
16:05:02 11 "With my presence?"

16:05:05 12 I told him: "I think we're over with you."

16:05:06 13 MR. SCHOEN: We are all agreed that we are  
16:05:09 14 finished, Mr. Nadime. And thank you very much.

16:05:12 15 THE VIDEOGRAPHER: Going off the record at  
16:05:14 16 4:03.

16:05:16 17 (Recess from 4:03 p.m. to 4:05 p.m.)

16:06:42 18 THE VIDEOGRAPHER: Going back on the record  
16:06:44 19 at 4:05.

16:06:48 20 MR. O'TOOLE: I would just note for the  
16:06:50 21 record that the defendants must object to postponing  
16:06:53 22 the depositions, in part, because we have a witness  
16:06:55 23 who is waiting in Ramallah by videoconference. The  
16:06:59 24 arrangements have been made, and he's ready to testify.

16:07:03 25 That having been said and without waiving that

16:07:06 1 objection, I can check to see his availability tomorrow.

16:07:09 2 He may not be available tomorrow. It may mean that,

16:07:12 3 if you don't depose him now, you aren't going to get

16:07:15 4 a chance at deposing this witness.

16:07:17 5 MR. SCHOEN: Well, we had spoken last

16:07:19 6 night about canceling today altogether. And that was

16:07:22 7 agreeable to the defendants last night, based on the

16:07:22 8 objections I raised about the documents.

16:07:22 9 We agreed instead to go forward this morning.

16:07:25 10 But, again, we started late today because the witness

16:07:28 11 was stuck in traffic or whatever the reason was. I

16:07:31 12 believe that was the reason. I think he explained that,

16:07:35 13 even. So it's certainly not anything intentional.

16:07:38 14 However, it is late in the day now. As I

16:07:41 15 said earlier, after this deposition, I would need to

16:07:44 16 take a half-hour break in any event. I believe when

16:07:46 17 I mentioned that to you, you said you also would want

16:07:49 18 to take a break between depositions. That would put

16:07:52 19 us at about after 4:30.

16:07:55 20 I don't think it makes any sense to start the

16:07:57 21 deposition and have to finish it by 6:00 o'clock today,

16:08:01 22 when the translators have to leave. I could not finish

16:08:05 23 it by 6:00 o'clock, based on what I now know. I think

16:08:09 24 this deposition today took longer than anticipated.

16:08:12 25 However, this witness was designated for many topics,

16:08:17 1 as is the next witness.

16:08:18 2 So our proposal would be to start with the  
16:08:21 3 next witness, this Dr. Swailem, who is appearing by  
16:08:25 4 video, in any event, in Ramallah, as I understand it,  
16:08:29 5 start with him at 9:00 o'clock in the morning, and  
16:08:32 6 then hopefully continue with the next two witnesses  
16:08:35 7 who are designated for tomorrow already, with the hope  
16:08:39 8 of finishing tomorrow.

16:08:41 9 MR. O'TOOLE: And, again, I can't agree with  
16:08:44 10 that without checking the witness' availability. I  
16:08:46 11 will check if the witnesses are available. But if the  
16:08:48 12 witness is not available, it's not clear to me whether  
16:08:51 13 or not we would have to go forward today, whether  
16:08:54 14 we would have to insist on that. I understand the  
16:08:57 15 logistical challenges.

16:08:58 16 Although I take one final issue with the idea  
16:09:02 17 that the witness being 20 or 30 minutes later than the  
16:09:06 18 attorneys here would have at all impacted the ability  
16:09:09 19 to go forward with the next deposition.

16:09:11 20 MR. SCHOEN: I'm just not sure. I was here at  
16:09:13 21 9:07. The witness was here at 9:45. I don't personally  
16:09:16 22 believe that that would have made the difference,  
16:09:17 23 frankly, one way or the other in a dispositive way.

16:09:21 24 I would remind you that the alternative that  
16:09:23 25 was agreed to last night would be for the same witness,

16:09:28 1 Dr. Swailem, to appear on Thursday at some point. So  
16:09:32 2 if that's what we need to do, then we'll need to do it.

16:09:35 3 MR. O'TOOLE: And that was pending his  
16:09:37 4 availability and, because of the late hour, we had not  
16:09:39 5 been able to check. So let me check on the witness'  
16:09:42 6 availability. Because Dr. Swailem has set aside today  
16:09:46 7 and has been waiting in Ramallah since 1:00 o'clock.  
16:09:48 8 So I do want to make sure he's available tomorrow.

16:09:53 9 MR. SCHOEN: Okay. So if you would check, the  
16:09:54 10 ideal would be to start first thing tomorrow morning and  
16:09:56 11 to work tonight to streamline things so that we can get  
16:09:59 12 through all the witnesses tomorrow, if that's possible.

16:10:01 13 MR. O'TOOLE: I propose that we adjourn for  
16:10:03 14 maybe 15 minutes so I can make some calls.

16:10:07 15 MR. HALLER: If you can move any one of the  
16:10:09 16 three that is available on Thursday, I don't know that  
16:10:12 17 it matters to us which order they are.

16:10:14 18 MR. SCHOEN: Right. But for right now, let's  
16:10:17 19 try to finish it all tomorrow.

16:10:18 20 MR. HALLER: No, no, no, definitely. But I'm  
16:10:18 21 saying, if you're checking the availability for Thursday  
16:10:19 22 as a backup, it could be any one of them.

16:10:23 23 MR. O'TOOLE: Right. Let me check.

16:10:24 24 MR. SCHOEN: And I can tell you, it's also a  
16:10:26 25 huge hassle for me. I mean, I have my reservation that

1 I've already had to change once.

2 MR. O'TOOLE: Right. And we'd prefer not

3 Thursday, too. So let's figure it out.

4 MR. SCHOEN: Thank you. We're going off the  
5 record.

6 THE VIDEOGRAPHER: That concludes the video  
7 deposition at 4:09.

8 (The deposition concluded at 4:09 p.m.)  
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## 1 CERTIFICATE OF WITNESS/DEPONENT

2  
3 I, NADIME AL-BARAHME, witness herein,  
4 do hereby certify and declare the within and foregoing  
5 transcription to be my examination under oath in said  
6 action taken on September 11, 2012, with the exception  
7 of the changes listed on the errata sheet, if any;

8 That I have read, corrected, and do hereby  
9 affix my signature under penalty of perjury to said  
10 examination under oath.

11  
12  
13  
14  
15 \_\_\_\_\_  
16 NADIME AL-BARAHME, Witness

\_\_\_\_\_ Date

CERTIFICATE OF REPORTER

I, AMY R. KATZ, RPR, do hereby certify:

That, prior to being examined, the witness named in the foregoing deposition was duly affirmed by me to testify to the truth, the whole truth, and nothing but the truth;

That the foregoing deposition was taken before me at the time and place herein set forth, at which time the aforesaid proceedings were stenographically recorded by me and thereafter transcribed by me;

That the foregoing transcript, as typed, is a true record of the said proceedings;

And I further certify that I am not interested in the action.

Dated this 30th day of October, 2012.

---

AMY R. KATZ, RPR



ERRATA SHEET

\*\*\* SHABTAI SCOTT SHATSKY, et al., v.

THE SYRIAN ARAB REPUBLIC, et al. \*\*\*

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NADIME AL-BARAHME, Witness

\_\_\_\_\_  
Date

SEPTEMBER 11, 2012 - NADIME AL-BARAHME

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